

Title V Permit Application
Texas Gulf Terminals Inc.
Texas Gulf Terminals Project

Appendix E

Prepared By:

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#### 1.1. PROJECT BACKGROUND

Texas Gulf Terminals Inc. (TGTI) is proposing to construct, own, and operate a Deepwater Port (DWP) terminal, as part of the Texas Gulf Terminal Project, in Federal waters of the U.S. Gulf of Mexico located approximately 14 miles off the coast of North Padre Island in Kleberg County, Texas.

Hereinafter, the Texas Gulf Terminal Project will be referred to as "the project" or "the proposed project." The purpose of the proposed project is to provide a logistical solution for the safe and reliable export of crude oil from the United States to free trade and non-free trade nations to support U.S. economic growth. The proposed project would fulfill the need for a safe, efficient, and cost-effective outlet for abundant supplies of domestic crude oil from existing and future oil fields located in the United States. The DWP terminal will include a Single Point Mooring (SPM) Buoy to moor a Very Large Crude Carrier (VLCC). The size of these VLCCs prevent them from using the docks at the onshore terminals. Therefore, VLCCs have to be engaged offshore. The project will serve as a crude oil export facility with a capacity of 60,000 barrels per hour (bph) and 192 million barrels per year. The project will be able to load up to 96 VLCCs per year. The proposed project is comprised of two major offshore components: the SPM Buoy system and the offshore pipelines. A detailed description of the SPM Buoy system components and the offshore pipeline system is provided in Section 5.

Per 33 CFR §148.3(d), The Environmental Protection Agency (EPA) is designated as cooperating agency to support the Coast Guard and MARAD in the review and evaluation of DWP license applications. Since the proposed project results in emissions of regulated pollutants in amounts greater than the Title V Major Source threshold of 100 tpy for criteria pollutants and 10/25 tpy of HAPs, TGTI is submitting this permit application as part of the DWP license application to MARAD/USCG. TGIT has prepared the application on Texas Commission on Environmental Quality (TCEQ) forms based on guidance received from EPA Region 6. With this submittal, TGTI is proposing to authorize the Volatile Organic Compounds (VOC) and HAP emissions resulting from the loading of crude oil from the DWP Terminal onto a VLCC. Based on potential air emissions from the facility, the project will be subject to the requirement to obtain a Title V operating permit regulations per 40 CFR Part 71 Requirements. A deepwater port is defined in 33 CFR 148.5 as follows:

Any fixed or floating manmade structures other than a vessel, or any group of structures, located beyond State seaward boundaries that are used or are intended for use as a port or terminal for the transportation, storage, or further handling of oil or natural gas for transportation to any State, except as otherwise provided in the Deepwater Ports Act of 1974, as amended, and for other uses not inconsistent with the purposes of the Deepwater Port Act, including transportation of oil and natural gas from the United States' OC; [...] Must be considered a 'new source' for purposes of the Clean Air Act.."

As mentioned above, the DWP consists of the SPM buoy system that is used for loading of crude carrier vessels. Per the 1974 DWPA, the revised 2012 DWPA, and the DWP regulations (40 CFR 148.5), a DWP new source for purposes of the Clean Air Act is defined as "any fixed or floating manmade structure other than a vessel, or any group of such structures, that are located beyond State seaward boundaries and that are used or intended for use as a port or terminal for the transportation, storage, or further handling of oil or natural gas for transportation to or from any State..."[1]. Therefore, vessels are not considered primary/direct sources of emissions from the Project for Clean Air Act Title V applicability.

Supporting documentation for this application is provided in the following sections. Included in Section 2 of this permit application discusses 40 CFR Part 71 Title V regulations. The project location is discussed in Section 3, with an area map indicating the site location. Section 4 of this permit application is the required applicant

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information (including 40 CFR Part 71 forms, TCEQ Form PI-1 and Table 1(a)). The process and project descriptions are provided in Section 5, including a process flow diagram. Emission calculations and summary is presented in Section 6. Applicable State and Federal requirements including BACT and case-by-case MACT are covered in Section 7. Permit fee is covered in Section 8. Lastly, certification of compliance is addressed in Section 9.

Per 40 CFR §71.3(a)(1) a major source of air emissions is subject to the permitting requirements under 40 CFR Part 71. Since potential emissions of VOC from the proposed SPM buoy system will exceed the Title V major source threshold of 100 tpy, the proposed SPM buoy system is subject to federal operating permit requirements contained in 40 CFR Part 71. TGTI is therefore obligated to submit a timely and complete application in accordance with 40 CFR §71.5.

According to this section, a timely application for a source that does not have an existing operating permit issued by a State under the State's approved part 70 program and is applying for a part 71 permit for the first time is one that is submitted within 12 months after the source becomes subject to the permit program (i.e., 12 months after commencing operation). However, because issuance of this permit is outside the scope of MARAD and USCG control, and may occur after a MARAD license is issued, TGTI is submitting this initial Title V application in advance of the regulatory due date of 12 months after commencing operation that is identified in 40 CFR §71 to allow for consistency of review within the National Environmental Protection Act (NEPA) process.

A complete application is defined as one that contains all of the information in 40 CFR §71.5(c). At the request of EPA Region 6, the Title V permit application is being submitted using EPA's Part 71 forms which are included in this application. The forms provided by EPA for 40 CFR Part 71 and the information included in this application narrative satisfy the following requirements for deeming a complete application:

- Identifying information, including plant name and address, owner's name and agent, and telephone number and names of the plant site manager/contact;
- ➤ A description of the source's processes and products (by SIC Code) including those associated with any proposed alternative operating scenarios identified by the source;
- Emissions related information including:
  - Emissions of regulated air pollutants;
  - Identification of points of emission;
  - Emission rates in tpy;
  - Information needed to determine emissions:
  - Identification and description of pollution control equipment;
  - Limitations on source operation affecting emissions or any work practice standards, where applicable for regulated pollutants;
  - Other information required by applicable requirements; and,
  - Emissions calculations;
- Citation of the applicable requirements;
- Other information needed to implement and enforce applicable requirements of the Clean Air Act or to determine applicability of other regulations;
- An explanation of any proposed exemptions from otherwise applicable requirements;
- > Additional information as deemed necessary;
- A certification of compliance; and
- List of insignificant activities and emissions levels.

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| With this application and the inclusion of the 40 CFR Part 71 forms in Section 4 of this application, TGTI is submitting a timely and complete Title V permit application for the proposed SPM buoy system. |            |  |  |  |
|---|------------|--|--|--|
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| Texas Gulf Terminals Inc.   Texas Gulf Terminal Project   | <b>უ</b> ვ |  |  |  |

#### 3.1. PROJECT LOCATION

The proposed DWP would be positioned within territorial seas of the OCS Mustang Island Area TX3 (Gulf of Mexico), within the Bureau of Ocean Energy Management (BOEM) block number 823. The proposed DWP is positioned at Latitude N27° 28′ 42.60″ and Longitude W97° 00′ 48.43″, approximately 12.7 nautical miles (14.62 statute miles) off the coast of North Padre Island in Kleberg County, Texas. Figure 3-1 provided below shows the location of the DWP terminal.

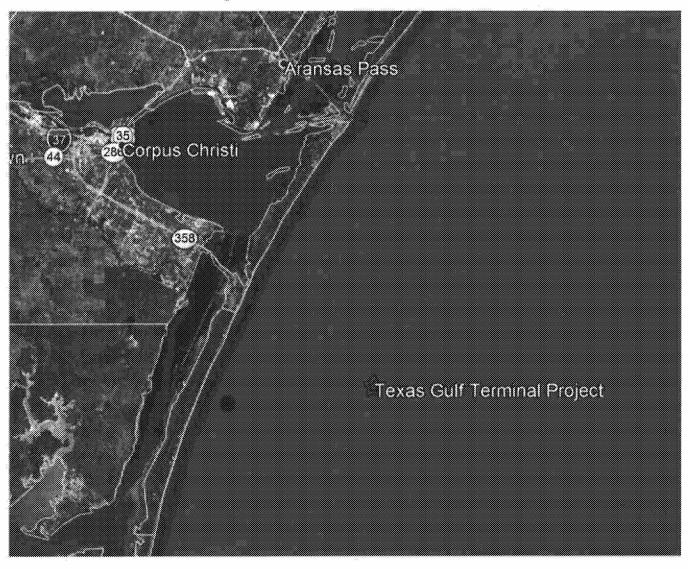


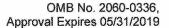
Figure 3-1. Location of the DWP Terminal

### **4. APPLICANT INFORMATION**

40 CFR PART 71 FORMS

**CORE DATA FORM** 

PI-1 FORM





# Federal Operating Permit Program (40 CFR Part 71) GENERAL INFORMATION AND SUMMARY (GIS)

| Α.                                      | Mailing Address and Contact Information   |  |  |  |
|---|---|--|--|--|
|   | Facility name <u>Texas Gulf Terminals Project</u>   |  |  |  |
|   | Mailing address: Street or P.O. Box 1401 McKinney, Suite 1500  City Houston State TX ZIP 77010  |  |  |  |
|   | Contact person: <u>Denise Rogers</u> Title <u>Regulatory Compliance Manager – North America</u>   |  |  |  |
|   | Telephone (832) 203 - 6493 Ext.   |  |  |  |
|   | Facsimile (832) 203 - 6401  |  |  |  |
| В.                                      | Facility Location   |  |  |  |
|   | Temporary source? Yes X No Plant site location Site is approximately 14 miles offshore the coast of Texas, Southeast of Corpus Christi. Latitude N27° 28' 42.6" and Longitude W97° 00' 48.43" |  |  |  |
|   | City N/A State N/A County N/A EPA Region 6  |  |  |  |
|   | Is the facility located within:   |  |  |  |
|   | Indian lands?YES _X_NO An offshore source in federal waters? _X_YESNO   |  |  |  |
|   | Non-attainment area?YES _X_NO If yes, for what air pollutants?  |  |  |  |
|   | Within 50 miles of affected State?YES _X_NO If yes, What State(s)?  |  |  |  |
| c.                                      | Owner   |  |  |  |
|   | Name Texas Gulf Terminals Inc. Street/P.O. Box 1401 McKinney, Suite 1500  |  |  |  |
|   | City <u>Houston</u> State <u>TX</u> ZIP <u>77010</u>  |  |  |  |
|   | Telephone (832) 203 - 6400 Ext  |  |  |  |
| D.                                      | Operator  |  |  |  |
|   | Name Texas Gulf Terminals Inc. Street/P.O. Box 1401 McKinney, Suite 1500  |  |  |  |
| *************************************** | City Houston State TX ZIP 77010   |  |  |  |
|   | Telephone (832) 203 - 6400 Ext  |  |  |  |
|   |   |  |  |  |

| E. Application Type  |   |  |  |  |  |  |
|--|---|--|--|--|--|--|
| Mark only one permit application type and answer the supplementary question appropriate for the type marked. |   |  |  |  |  |  |
| X Initial Permit Renewal Significant Mod Minor Permit Mod(MPM)   |   |  |  |  |  |  |
| Group Processing, MPM Administrative Amendment   |   |  |  |  |  |  |
| For initial permits, when did operations commence? TBD   |   |  |  |  |  |  |
| For permit renewal, what is the expiration date of current permit?/  |   |  |  |  |  |  |
| F. Applicable Requirement Summary  |   |  |  |  |  |  |
| Mark the types of applicable requirements that apply:  |   |  |  |  |  |  |
| SIPFIP/TIP _X_PSDNon-attainment NS   | SR                                      |  |  |  |  |  |
| Minor source NSR Section 111 Phase I acid rainPhase II acid rain   |   |  |  |  |  |  |
| Stratospheric ozone OCS regulations NESHAP Sec. 112(d) MAC   | T                                       |  |  |  |  |  |
| X Sec. 112(g) MACT Early reduction of HAP Sec 112(j) MACT RMP [Sec.112(r                                     | )]                                      |  |  |  |  |  |
| Section 129 NAAQS, increments or visibility but for temporary sources (This is rare                          | <del>)</del> )                          |  |  |  |  |  |
| Is the source subject to the Deepwater Port Act? X YES NO  |   |  |  |  |  |  |
| Has a risk management plan been registered?YES _X_NO Agency  | Koni                                    |  |  |  |  |  |
| Phase II acid rain application submitted?YES _X_NO _If YES, Permitting Authority                             |   |  |  |  |  |  |
| G. Source-Wide PTE Restrictions and Generic Applicable Requirements  |   |  |  |  |  |  |
| Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements | i.                                      |  |  |  |  |  |
|  | *************************************** |  |  |  |  |  |
| Please see Appendix E of application.  |   |  |  |  |  |  |
|  |   |  |  |  |  |  |
|  |   |  |  |  |  |  |
|  |   |  |  |  |  |  |
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### **H. Process Description**

List processes, products, and SIC codes for the facility.

| Process                 | Products           | SIC   |
|-------------------------|--------------------|-------|
| Marine Loading Terminal | Crude / Condensate | 4612  |
|                         |                    | ATTEM |
|                         |                    |       |
|                         |                    |       |

3

#### I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

| Emissions Unit ID | Description of Unit |
|-------------------|---------------------|
| LOADFUG           | Marine Loading      |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |
|                   |                     |

#### J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each regulated air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants, stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

| NOx tons/yr VOC 10,808 tons/yr SO2 tons/yr  |  |  |  |  |  |
|---|--|--|--|--|--|
| PM-10 tons/yr CO tons/yr Lead tons/yr   |  |  |  |  |  |
| Total HAP 200 tons/yr   |  |  |  |  |  |
| Single HAP with greatest amount <u>Toluene</u> PTE <u>101.6</u> tons/yr                       |  |  |  |  |  |
| Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE 4.000 tons/yr |  |  |  |  |  |
| K. Existing Federally-Enforceable Permits   |  |  |  |  |  |
| Permit number(s) N/A Permit type Permitting authority   |  |  |  |  |  |
| Permit number(s) N/A Permit type Permitting authority   |  |  |  |  |  |
| L. Emission Unit(s) Covered by General Permits  |  |  |  |  |  |
| Emission unit(s) subject to general permit <u>N/A</u>   |  |  |  |  |  |
| Check one: Application made Coverage granted  |  |  |  |  |  |
| General permit identifier Expiration Date/  |  |  |  |  |  |
| M. Cross-referenced Information   |  |  |  |  |  |
| Does this application cross-reference information? YES X NO (If yes, see instructions)        |  |  |  |  |  |

INSTRUCTIONS FOLLOW

### INSTRUCTIONS FOR GIS, GENERAL INFORMATION AND SUMMARY

Use this form to provide general and summary information about the part 71 source (facility or plant) and to indicate the permitting action requested. Submit this form once for each part 71 source. Several sections of this form ask for information you may not know until you complete other part 71 forms.

**Section A** - Enter the facility's official or legal name. The contact person should be a person familiar with the day-to-day operation of the facility, such as a plant site manager or similar individual.

**Section B** – If different from the mailing address, include the plant site location.

Sections C and D - If more than one owner or operator, list them on an attachment.

**Section E** - Mark initial permit issuance if you are applying for the first time. For all types of permit revisions, applicants must provide a brief narrative description of the changes.

**Section F** - Indicate the broad categories of applicable requirements that apply to the facility or any emissions units. Note that acid rain requirements must be included in part 71 permits the same as other requirements. Also, see definition of "applicable requirement" in part 71. Offshore sources in Federal waters may be either Outer Continental shelf (OCS) sources or Deepwater Port Act (DPA) sources, but not both. The DPA is not an applicable requirement, but the EPA needs to know if such requirements apply because the EPA coordinates with other Federal agencies on such projects.

**Section G** – List emission-limiting requirements that apply to the facility as a whole, such as restrictions on potential to emit or applicable requirements that apply identically to all emission units at a facility.

**Section H** - List, in descending order of priority, the 4-digit standard industrial classification (SIC) code(s) that best describes your facility in terms of its principal products or processes, and provide a brief narrative description for each classification. For a listing of SIC codes, see the <u>Standard Industrial Classification Manual</u>, 1987 edition, prepared by the Executive Office of the President, Office of Management and Budget, from the Government Printing Office, Washington DC.

**Section I** - Assign a unique identifier (unit ID) under the "emissions unit ID" column and provide a text description for each significant emissions unit at facility. These IDs will be used in other part 71 forms. A "significant emissions unit" is any unit that is not an insignificant emission unit or activities. Note that unit IDs need only be assigned if they will be referenced in subsequent portions of the application. You may choose any numbering system you wish to assign unit IDs. If a unit ID was previously assigned, use the original ID. If the unit is a new unit, assign a unit ID consistent with the existing units' IDs.

You may group emissions units, activities, or pieces of equipment together and assign a single unique unit ID when they are subject to the same applicable requirement(s) and will have the same monitoring, record keeping, and reporting requirements in the permit.

In addition, assign a unit ID for each alternative operating scenario and each piece of pollution control equipment. When possible, assign these numbers to show with which emissions units or processes these scenarios or control devices are associated.

**Section J** – Enter the facility-wide PTE for each listed air pollutant for applicability purposes and enter the facility-wide actual emissions of all pollutants that count for fee purposes. Applications for permit revisions should report PTE after the change for the emissions units affected by the change.

Completion of form PTE is recommended prior to the entry of PTE information in this section.

Note that the emissions of greenhouse gasses (GHGs) are not counted for major source applicability purposes or for part 71 fee purposes, so no need to enter them anywhere on this form.

Note that a source may be major for a single HAP or any combination of HAP.

Include fugitive emissions when reporting PTE to the extent that they count toward major source applicability. All fugitive emissions of HAP count toward major source applicability.

Sources may also stipulate to major source status for the pollutants indicated on the form by entering "Major" in the space provided for PTE values.

You may use the value for actual emissions from section F, line 5, of form **FEE**. When totaling actual emissions for fee purposes, include all emissions, including fugitive emissions, regardless of whether they count for applicability purposes.

**Section L** - If any emissions unit within your facility is applying, has applied, or currently has a general permit, identify the emissions unit ID and name of the unit, consistent with section I of this form.

**Section M** - Attach copies of any cross-referenced documents that are not publicly available or otherwise available to the permitting authority.

END

<sup>&</sup>quot;NOx" is for nitrogen oxides,

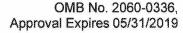
<sup>&</sup>quot;VOC" is for volatile organic compounds,

<sup>&</sup>quot;SO2" is for sulfur dioxide,

<sup>&</sup>quot;PM10" is for particulate matter with an aerodynamic diameter of 10 micrometers or less,

<sup>&</sup>quot;CO" is for carbon monoxide, and

<sup>&</sup>quot;Lead" is for elemental lead regulated by a NAAQS ("compounds of lead" are HAP).





### Federal Operating Permit Program (40 CFR Part 71) INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

| Number | Description of Activities or Emissions Units | RAP<br>(except HAP) | НАР |
|--------|--|---------------------|-----|
| N/A*   |  |                     |     |
|        |  |                     |     |
|        |  |                     |     |
|        |  |                     |     |
|        |  |                     |     |
|        |  |                     |     |
|        |  |                     |     |
|        |  |                     | l l |
|        |  |                     |     |
|        |  |                     |     |

<sup>\*</sup> No emission sources have been listed as Insignificant Activities/ Emission Sources since the application is being submitted for obtaining both construction and operation authorization and the PSD preconstruction permitting program does not define an insignificant emissions unit.

### INSTRUCTIONS FOR IE INSIGNIFICANT ACTIVITIES

Use this form only if you have any equipment, emissions units, or emitting activities at your facility that qualify for insignificant treatment due to insignificant emissions levels (defined in the part 71 rule) and you desire such treatment.

Generally identify the source of emissions.

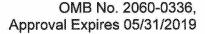
The "number" column is provided to indicate the total number or units or activities grouped together under one description, for example, equipment such as valves and flanges. However, units or activities that are similar should be listed separately in the form when the descriptions differ in a meaningful way, such as when capacities or sizes differ and this information is relevant, for example, to an applicability determination.

Check one of the columns provided to indicate which emission level criteria of part 71 is met for these units or activities that warrant such treatment. The rule provides 2 emission criteria:

- emissions of 2 tons per year or less or any regulated pollutants except HAP (RAP, except HAP) from any emission unit, or
- 1000 pounds per year or less of any HAP from any emission unit.

Note that part 71 does not exempt any insignificant units from major source applicability determinations.

In addition, attach to this form information concerning equipment, activities, or emissions units that are exempted from an otherwise applicable requirement (e.g., grandfathered emissions units. Please cite the basis for the exemption (e.g., State administrative code or Federal regulation).





## Federal Operating Permit Program (40 CFR Part 71) **EMISSION CALCULATIONS (EMISS)**

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

#### A. Emissions Unit ID LOADFUG

#### B. Identification and Quantification of Emissions

For each emissions unit identified above, list each regulated air pollutant or other pollutant for which the source is major, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. See instructions concerning GHGs. Values should be reported to the nearest tenth (0.1) of a ton for yearly values or tenth (0.1) of a pound for hourly values.

|                | Emission Rates                   |                   |                     |         |
|----------------|----------------------------------|-------------------|---------------------|---------|
|                | Actual                           |                   |                     |         |
| Air Pollutants | Annual<br>Emissions<br>(tons/yr) | Hourly<br>(lb/hr) | Annual<br>(tons/yr) | CAS No. |
| VOC            | N/A                              | 7,483             | 10,808              |         |
| H₂S            | N/A                              | 0.16              | 0.24                |         |
| НАР            | N/A                              | 125               | 200                 |         |
|                |                                  |                   |                     |         |
|                | DATE PAGE                        |                   |                     |         |
|                |                                  |                   |                     |         |
|                | 3133.50                          |                   |                     |         |
|                |                                  |                   |                     |         |
|                |                                  |                   |                     |         |

#### **NSTRUCTIONS FOR EMISS**

#### **EMISSION CALCULATIONS**

Use this form to quantify emissions for each significant emissions unit identified in section I of form GIS. This form will help you organize emissions data needed on forms PTE and FEE. Do not complete this form for any units or activities listed as insignificant on form IE. Sources applying for permit revisions only need complete this form for each emissions unit affected by the change.

Section A - The emissions unit ID should be the same as that used in section I of form GIS.

**Section B** - First, list each "regulated air pollutant" that is emitted by the unit. Please list each HAP separately. Most sources will not need to provide emissions estimates for GHG because GHGs do not count in major source determinations; however, list GHGs for any unit that is subject to an emissions limitation or standard for GHGs [e.g., GHG BACT or a section 111(b) or 111(d) standard].

Second, list any "regulated pollutant (for fee calculation)" emitted at the source that has not already been listed. If you will not be submitting form FEE with your application, you do not need to perform this step or calculate actual emissions. For fee purposes, fugitive emissions count the same as stack emissions. Any HAP that has not been listed up to this point may be simply listed as "HAP." Note that GHGs, carbon monoxide, Class I or II substances under title VI, and pollutants regulated solely by section 112(r) are exempt from fee payment.

Third, calculate the actual emissions of "regulated pollutants (for fee calculation) that you listed in the step above. Actual emissions are calculated based on actual operating hours, productions rates, and in-place control equipment, and the types of materials used during the preceding calendar year. If you already have a permit, you should use the compliance methods required by the permit, such as monitoring or source test data, whenever possible; if not possible, you may use other federally recognized procedures.

Most sources will calculate actual emissions for the preceding calendar year. Sources that commenced operation during the preceding calendar year shall estimate emissions for the current calendar year. Certain sources have the option of estimating their actual emissions for the preceding calendar year, instead of calculating them based on actual emissions data, see the instructions for form FEE for more on this topic.

Your emission calculations may be based on generally available information rather than new source testing or studies not already required. If you have listed a pollutant but are unable to calculate its actual emissions without conducting new source testing or extensive studies, you may enter "UN" (for "unknown") in the space provided.

Values should be reported to the nearest tenth (0.1) of a ton; greater precision (i.e., more decimal places) may be used to report values if you believe it will result in a lower fee.

Fourth, calculate PTE for each "regulated air pollutant" you listed in the first step above. For pollutants not specifically regulated at this emission unit, do not calculate PTE in pounds/hour. You may stipulate that the unit alone triggers major source status for this pollutant by entering "MU" in the space provided for annual PTE values. You may stipulate that the unit does not trigger major source status, but that the aggregate facility emissions or another unit triggers major source status by entering "MS" in the space provided for annual PTE values.

Do not calculate PTE values for air pollutants listed solely for fee purposes, however, enter "NA" for "not applicable" in the space provided for PTE values for such emissions.

If you are unable to calculate PTE values for air pollutants counted for applicability purposes without conducting new source testing or extensive studies, enter "UN" (for "unknown") in the space provided.

Within applications for permit revisions, PTE should be calculated assuming the proposed change has occurred.

"Potential to emit" is defined as "the maximum capacity of a stationary source to emit any pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation is enforceable by the Administrator."

Values for PTE should be reported to the nearest tenth (0.1) of a ton or pounds (additional decimal places may be used to report values with greater precision if desired). After reviewing a submittal, the EPA may request additional information regarding the basis of the values reported on the forms (i.e., request to see values reported with greater precision, to the nearest 0.01 or 0.001).

Provide the chemical abstract service number (CAS No.), if available,

**END** 



OMB No. 2060-0336, Approval Expires 05/31/2019

Federal Operating Permit Program (40 CFR Part 71)
FEE CALCULATION WORKSHEET (FEE)

|    | Use this form initially, or thereafter on an annual basis, to calculate part 71 fees.   |  |  |  |  |  |
|----|---|--|--|--|--|--|
| Α. | General Information   |  |  |  |  |  |
|    | Type of fee (Check one): X_InitialAnnual  |  |  |  |  |  |
|    | Deadline for submitting fee calculation worksheet/  |  |  |  |  |  |
|    | For initial fees, emissions are based on (Check one):   |  |  |  |  |  |
|    | X Actual emissions for the preceding calendar year. (Required in most circumstances.)   |  |  |  |  |  |
|    | Estimates of actual emissions for the current calendar year. (Required when operations commenced during the preceding calendar year.)   |  |  |  |  |  |
|    | Date commenced operations//   |  |  |  |  |  |
|    | Estimates of actual emissions for the preceding calendar year. (Optional after a part 71 permit was issued to replace a part 70 permit, but only if initial fee payment is due between January 1 and March 31; otherwise use actual emissions for the preceding calendar year.) |  |  |  |  |  |
|    | For annual fee payment, you are required to use actual emissions for the preceding calendar year.   |  |  |  |  |  |
| В. | Source Information: Complete this section only if you are paying fees but not applying for a permit.  |  |  |  |  |  |
|    | Source or facility name   |  |  |  |  |  |
|    | Mailing address: Street or P.O. Box   |  |  |  |  |  |
|    | City StateZIP   |  |  |  |  |  |
|    | Contact personTitle   |  |  |  |  |  |
|    | Telephone () Ext Part 71 permit no  |  |  |  |  |  |
| c. | Certification of Truth, Accuracy and Completeness: Only needed if not submitting a separate form CTAC.  |  |  |  |  |  |
|    | I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in this submittal (form and attachments) are true, accurate and complete.  Name (signed) Denise Rogers Date: 10 126 1                 |  |  |  |  |  |
|    |   |  |  |  |  |  |

FEE 2

#### D. Annual Emissions Report for Fee Calculation Purposes - Non-HAP

You may use this to report actual emissions (tons per year) of regulated pollutants (for fee calculation) on a calendar-year basis for both initial and annual fee calculation purposes. Section E is designed to report HAP emissions. Quantify all actual emissions, including fugitives, but do not include insignificant emissions and certain regulated air pollutants that are not counted for fee purposes, such as CO and GHGs (see instructions). Sum the emissions in each column to calculate subtotals. Subtotals should be reported to the nearest tenth (0.1) of a ton at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

This data is for See Note 1 below (year)

| Emission Unit ID            | NOx                                     | VOC | SO2 | PM10 | Lead | Other |
|-----------------------------|---|-----|-----|------|------|-------|
| LOADFUG<br>(Marine Loading) |   | 0   |     |      |      | 0     |
| SUBTOTALS:                  | 101111111111111111111111111111111111111 | 0   |     |      |      | 0     |

Note 1 – The proposed project has not yet commenced operation and therefore actual emissions are zero for all pollutants.

#### E. Annual Emissions Report for Fee Calculation Purposes -- HAP

<u>HAP Identification</u>. Identify individual HAP emitted at the facility, identify the CAS number, and assign a unique identifier for use in the second table in this section. Whenever assigning identifier codes, use "HAP1" for the first, "HAP2" for the second, and so on.

| Name of HAP | CAS No   | Identifier |  |
|-------------|----------|------------|--|
| Benzene     | 71-43-2  | HAP1       |  |
| Toulene     | 108-88-3 | HAP2       |  |

<u>HAP Emissions</u>. Report the actual emissions of individual HAP identified above. Use the identifiers assigned in the table above. Include all emissions, including fugitives, and do not include insignificant emissions. Sum the emissions in each column to calculate subtotals. Report subtotals to the nearest tenth (0.1) of a ton at the bottom of the page. If any subtotal exceeds 4,000 tons, enter 4,000.

This data is for See Note 1 below (year)

| Emissions Unit ID           | Actual Emissions (Tons/Year) |      |  |  |  |  |  |
|-----------------------------|------------------------------|------|--|--|--|--|--|
|                             | HAP1                         | HAP2 |  |  |  |  |  |
| LOADFUG<br>(Marine Loading) | 0                            | 0    |  |  |  |  |  |
| SUBTOTALS:                  | 0                            | 0    |  |  |  |  |  |

Note 1 – The proposed project has not yet commenced operation and therefore actual emissions are zero for all pollutants.

FEE 4

#### F. Fee Calculation Worksheet

This worksheet is used to calculate the total fee owed (including the emissions-based fee and the GHG fee adjustment) for both initial and annual fee payment purposes. Reconciliation is only for cases where you are paying the annual fee and you used any type of estimate of actual emissions when you calculated the initial fee. If you do not need to reconcile fees, complete line 1-5 (emissions summary) and then skip down to line 21 (emission calculation). See instructions for more detailed explanation.

#### **EMISSIONS SUMMARY**

| 1.             |  | *************************************** |
|----------------|--|---|
|                | Sum the subtotals from section D of this form (non-HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.  | 0                                       |
| 2.             | Sum the subtotals from section E of this form (HAP) and enter the total, rounded to the nearest tenth (0.1) of a ton.  | 0                                       |
| 3.             | Sum lines 1 and 2.   | 0                                       |
| 4.             | Enter the emissions that were counted twice. If none, enter "0."   | 0                                       |
|                | Subtract line 4 from line 3, round to the nearest ton, and enter the result here. This is the <b>total emissions</b> that count for fees purposes.   | 0                                       |
|                | FOR THE "CURRENT" CALENDAR YEAR)   |   |
| Or<br>em       | FOR THE "CURRENT" CALENDAR YEAR)  ally complete lines 6-10 if you are paying the first annual fee and initial fees were based on issions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 11.  | on estimated actual<br>ine 21.          |
| en             | ally complete lines 6-10 if you are paying the first annual fee and initial fees were based on issions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 1.   | on estimated actual<br>ine 21.<br>N/A   |
| en<br>6.       | nly complete lines 6-10 if you are paying the first annual fee and initial fees were based on the calendar year in which you paid initial fees; otherwise skip to line 11 or to line 11. Enter the total estimated actual emissions for the year the initial fee was paid  | ine 21.                                 |
| en<br>6.       | If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result.  Otherwise enter "0."   | ine 21.                                 |
| em<br>6.<br>7. | Ily complete lines 6-10 if you are paying the first annual fee and initial fees were based on issions for the calendar year in which you paid initial fees; otherwise skip to line 11 or to line the total estimated actual emissions for the year the initial fee was paid (previously reported on line 5 of the initial fee form).  If line 5 is greater than line 6, subtract line 6 from line 5, and enter the result. Otherwise enter "0."  If line 6 is greater than line 5, subtract line 5 from line 6, and enter the result. Otherwise enter "0." | ine 21.                                 |

result here. This is the overpayment. Go to line 21.

# RECONCILIATION (WHEN INITIAL FEES WERE BASED ON ESTIMATES FOR THE "PRECEDING" CALENDAR YEAR)

Only complete lines 11-20 if you are paying the first annual fee and initial fees were based on estimated actual emissions for the calendar year preceding initial fee payment; otherwise skip to line 21. If completing this section, you will also need to complete sections D and E to report actual emissions for the calendar year preceding initial fee payment.

| 11. Sum the actual emissions from section D (non-HAP) for the calendar year preceding initial fee payment and enter the result here.   | N/A |
|--|-----|
| 12. Sum the actual emissions from section E (HAP) for the calendar year preceding initial fee payment and enter the result here.   |     |
| 13. Add lines 11 and 12 and enter the total here. These are total actual emissions for<br>the calendar year preceding initial fee payment.   |     |
| 14. Enter double counted emission from line 13 here. If none, enter "0."   |     |
| 15. Subtract line 14 from line 13, round to the nearest ton, and enter the result here.  |     |
| 16. Enter the total estimated actual emissions previously reported on line 5 of the initial<br>fee form. These are estimated actual emissions for the calendar year preceding<br>initial fee payment.                                  |     |
| 17. If line 15 is greater than line 16, subtract line 16 from line 15, and enter the result here. Otherwise enter "0."   |     |
| 18. If line 16 is greater than line 15, subtract line 15 from line 16, and enter the result here. Otherwise enter "0,"   |     |
| 19. If line 17 is greater than 0, multiply line 17 by last year's fee rate (\$/ton) and enter the result here. This is the underpayment.   |     |
| 20. If line 18 is greater than 0, multiply line 18 by last year's fee rate (\$/ton) and enter the result on this line. This is the overpayment.  |     |
| EMISSION FEE CALCULATION   |     |
| 21. Multiply line 5 (tons) by the current fee rate (\$/ton) and enter the result here. This is the unadjusted emissions fee. Continue on to line 23.   | 0   |
| GHG FEE ADJUSTMENT   |     |
| 22. If you are submitting an initial permit application and this is the first time you are paying fees, enter \$2,236, otherwise enter "0". [Note that any updates to the initial application are covered under this one-time charge.] | 0   |
| <ol> <li>Enter the number of permit modifications (or related permit actions) you have<br/>submitted to the permitting authority since you last paid fees. If none, skip to line 25.</li> </ol>  | 0   |
| 24. Multiply the number in line 23 by \$365 and enter the result.  | 0   |

| 25. If you have submitted a permit renewal application since the last time you paid fees<br>enter \$520, otherwise enter "0"   | 0 |
|--|---|
| 26. Sum line 22, 24, and 25 and enter the result. This is the GHG fee adjustment   | О |
| OTHER ADJUSTMENTS  |   |
| 27. Add the total on line 21 and the total on line 26 and enter the result.  | 0 |
| 28. Enter any underpayment from line 9 or 19 here. Otherwise enter "0."  | 0 |
| 29. Enter any overpayment from line 10 or 20 here. Otherwise enter "0."  | 0 |
| 30. If line 28 is greater than "0," add it to line 27 and enter the result here. If line 29 is greater than "0," subtract this from line 27 and enter the result here. Otherwise enter the amount on line 27 here. This is the fee adjusted for over/underpayment. | 0 |
| 31. Enter any credit for fee assessment error here. Otherwise, enter "0."  | 0 |
| 32. Subtract line 31 from line 30 and enter the result here. Stop here. This is the TOTAL FEE (AFTER ADJUSTMENTS) that you must remit to EPA.  | o |

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### INSTRUCTIONS FOR FEE FEE CALCULATION WORKSHEET

#### Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

#### **DETAILED INSTRUCTIONS**

Use this form to initially or annually calculate fees. This form is for paying fees to EPA or a delegate agency (such as a State or tribe) under a part 71 operating permit program. The requirements for paying fees under part 71 programs, as well as the forms and instructions contained herein, are based on the requirements of 40 CFR 71.9

There may be cases, under a part 71 program, when you are not required to complete this form or pay the EPA fee rate (where the part 71 program has been delegated and EPA's fee has been suspended because EPA incurs no administrative costs). In such cases, the delegate agency will instruct you on how to calculate fees and how to pay them. If in doubt, contact your permitting authority.

#### General Rules for Fee Calculation under Part 71:

- Use the fee rate in effect at the time you pay the fee regardless of the time period that the
  emissions data represents. For example, if the annual fee for the current year is due July 1, you
  would use the fee rate in effect for the current year and the actual emissions for the previous
  calendar year.
- Do not prorate initial or annual fees. Pay full fees for the entire calendar year regardless of how many days you operated or were subject to the program during the previous or current year.
- Do not hesitate to contact the permitting authority if you have any doubt about how to calculate fees, especially if you have an unusual set of circumstances not addressed specifically by these forms or whenever the permit requirements appear to conflict with these forms (however, always assume the permit requirements take precedence in such cases).

#### Section A. General Information

The deadline for submitting the fee form and paying the fee for <u>initial fee payment</u> purposes for most sources is the same deadline as for submitting all other forms required for the initial permit application. Other deadlines apply for initial fee payment in certain limited circumstances:

- When a source is subject to part 71 because of an unresolved EPA objection to a part 70 permit, fees are not due with the part 71 application, but are due 3 months following the date of the issuance of the part 71 permit.
- When EPA withdraws approval of a part 70 program and implements a part 71 programs, fees
  are submitted according to a schedule based on the source's SIC code (within 6 to 9 months of
  the effective date of the part 71 program).

The deadline for submitting the fee form and paying the fee for <u>annual fee payment</u> purposes is the anniversary date of initial fee payment. This is required whether or not a permit has been issued. If you were required to pay initial fees between January 1 and March 31, the regulations allow for submittal of annual fees no later than April 1.

Whether you are paying initial or annual fees see the instructions for sections D and E for more information on which calendar-year emission data to use (preceding or current year) and how to quantify such emissions (actual emissions or estimates of actual emissions).

#### Section B. Source Information

Complete this section only if you are preparing this form for submittal at a different time than for the other portions of an initial application or for annual fee purposes.

#### Section C. Certification of Truth, Accuracy and Completeness

This form and any other document required by a permit must be signed by a responsible official certifying truth, accuracy and completeness of the information. If you are submitting a separate CTAC form, there is no need to complete this section of the form. If you complete this section, there is no need to submit form CTAC separately.

#### Section D. Annual Emissions Report for Fee Calculation Purposes - Non-HAP

Calculate actual emissions of regulated pollutants (for fee calculation), except for HAP, on a calendaryear basis for the facility in this section. Section E is provided to report actual emissions of HAP. Note the phrase "regulated pollutant (for fee calculation)" is any "regulated air pollutant" except carbon monoxide (CO), and pollutants regulated solely because they are: 1) subject to regulation under section 112(r) of the Act, or 2) a class I or II substance under title VI of the Act. **Note that GHG emissions are not counted for fee purposes.** 

If more than one year of data is being submitted with the fee calculation worksheet, copy this page and complete a separate table for each year. If you are submitting an initial application, you may use emissions data already reported on form **EMISS**, provided this is the same data you would otherwise report in sections D and E of this form. If using **EMISS** in this manner, please note this on the fee calculation form. Also, sources must submit attachments to this form to show (at a minimum) examples of the calculations used to determine these values.

Show actual emissions for each listed air pollutant for each emission unit. Values should be reported to the nearest tenth (0.1) of a ton.

The column for "other" is for other regulated pollutants (for fee calculation) not already listed on the form. Write in the name of the pollutant in the proximity of the "other" column. If more than one such pollutant, show the pollutants, and the totals on an attachment.

<u>Actual emissions</u> must be calculated using actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted over the preceding calendar year. Sources that have been issued title V permits are required to compute actual emissions using compliance methods required by the permits, such as monitoring or source testing data. If this is not possible, actual emissions should be determined using other federally recognized procedures.

<u>For initial fee calculation purposes</u>, most sources are required to use actual emissions for the preceding calendar year. However, there are certain exceptions where estimates of actual emissions are either required or allowed in place of actual emissions for the preceding calendar year (see table below):

| Exception  | Emission Data   |
|--|---|
| When the source commenced operation during the preceding calendar year.  | Estimates of actual emissions for the<br>"current" calendar year are required   |
| When EPA withdraws approval of a part 70 program and implements a part 71 program, and the source pays initial part 71 fees between January 1 and March                        | Either estimates of actual emissions for the "preceding" calendar year or actual emissions for the preceding calendar year may be used. |
| When a part 71 permit was issued following an unresolved objection to a part 70 permit, and the source is required to pay initial part 71 fees between January 1 and March 31. | Either estimates of actual emissions for the "preceding" calendar year or actual emissions for the preceding calendar year may be used. |

<u>For annual fee purposes</u>, fee calculation should be based on actual emissions for the preceding calendar year in all cases.

In most cases you will only need to report one set of emission data using sections D and E of this form (the data that is the basis of the initial or annual fee being paid as explained above). This data is subsequently carried over to lines 1 and 2 of section F (Fee Calculation Worksheet) of the form.

However, there is one exception where you would be required to report two different sets of emissions data using sections D and E – when paying the first annual fee and reconciliation is required because the initial fee was based on estimated actual emissions for the "preceding" calendar year (the year preceding initial fee payment). In this case, the two data sets would be:

- actual emissions for the year initial fees paid (for annual fee purposes in lines 1-5 of section F of the form), and
- actual emissions for the year preceding initial fee payment (for reconciliation in lines 11-20 of the form)

Whenever reconciliation is required as part of annual fee payment, you will also need a copy of the fee forms you previously submitted with initial fee payment in order to obtain the value of estimated actual emissions.

Include all fugitive emissions in the calculation of actual emissions, including those that do not count for applicability. Do not include any insignificant emissions identified on form IE.

The subtotal line in section D of the form is provided at the bottom of each column to enter total emissions for each pollutant reported above. Each subtotal should be reported to the nearest tenth (0.1) of a ton. If any subtotal exceeds 4,000 tons, enter 4,000 tons for that column.

Any necessary adjustments for double counting of emissions will be performed later in section F.

#### Section E. Annual Emissions Report for Fee Calculation Purposes -- HAP

List the actual emissions of individual HAP from each emission unit. If you are initially applying for a permit, you may use the emissions of HAP reported on form **EMISS**, instead of completing this section of this form, provided these emissions are the same as you would otherwise report using this section of the form. If you are doing this, please note it on the form.

This section is composed of two tables. The first table is to identify individual HAP emitted at each emission unit. Assign a unique identifier for use in the second table. Please use "HAP1" for the first

FEE 10

one, "HAP2" for the second one, and so on. The second table is to calculate the actual emission of individual HAP at each emission unit. Use the identifiers assigned in the first table to label the column headers for the second table. You may round and report these emissions to the nearest tenth (0.1) of a ton. Sum the values in each column and enter the subtotals at the bottom of the table. If any subtotal exceeds 4,000 tons, enter 4,000 for that column.

See instructions for section D for more information on reporting emissions data.

#### Section F. Fee Calculation Worksheet

This worksheet is used to sum the total tons of actual emissions subject to fees, adjust for double counting of emissions, perform certain reconciliations for underpayment and overpayment of fees and adjust for fee assessment errors, if needed, and ultimately to determine the total fee to be paid.

A detailed explanation of Section F follows (separated into six parts):

#### **Emissions Summary**

The subtotals for each pollutant listed in Sections D and E (or from form **EMISS**) are added together to calculate the total emissions (in tons per year) for the facility.

The emissions that are reported here will vary for initial fee payment purposes, depending on the specific circumstances, but will always be actual emissions for the preceding calendar year for annual fee purposes. See the instructions for section D for more on the emissions data you should use in the part of the form.

The total emissions are adjusted for double counting and are rounded to the nearest ton. For example, double counting may occur where a pollutant is defined as HAP and VOC. If you adjust for double counting, attach an explanation for this.

### Reconciliation (When Initial Emission Fees Were Based on Estimates for the Current Calendar Year)

This section is only used by sources paying their first annual fee when their initial fee was based on estimates of calendar-year emissions for the "current" year (the same year that initial fees were paid). This reconciliation is done by comparing the actual emissions for the "current" year provided in sections D and E of this submittal with the estimate of those emissions previously provided with initial fee payment. There may have been overpayment or underpayment of the initial fee. The fee you are paying now will be adjusted for this difference later.

### Reconciliation (When Initial Emission Fees Were Based on Estimates for the Preceding Calendar Year)

This section is only used by sources paying their first annual fee when their initial fee was based on estimates of calendar-year emissions for the year preceding initial fee payment, provided the source was required to pay its initial fee between January 1 and March 31, and EPA issued the Part 71permit to replace a Part 70 permit. This reconciliation is done by comparing the actual emissions for the "preceding" year provided in sections D and E of this submittal with the estimate of those emissions provided with initial fee payment. There may have been overpayment or underpayment of the initial fee. The fee you are paying now will be adjusted for this difference later.

FEE 11

#### **Emission Fee Calculation**

Calculate the emission-based fee using the emissions from line 5 (tons) multiplied by the fee rate (\$/ton) in effect at the time the fee is paid.

#### **GHG Fee Adjustment**

The part 71 rule was amended in 2015 to require the fees to be increased by a GHG fee adjustment. The GHG adjustment must be calculated by each source that is required to pay fees. The adjustment is based on the burden for the permitting authority to conduct certain GHG evaluations or reviews related to the source, rather than on emissions. Set fees are charged for certain activities that have occurred at the source since the last time fees were paid. For an initial application, the set fee is a one-time charge that includes the costs of processing application updates. The term "permit modification" refers to any significant and minor modifications, but not to administrative amendments. The number of permit modifications must be multiplied by the set fee for modifications to determine the total GHG adjustment for modifications. The set fee for a permit renewal also includes any permit modifications that may be processed at the same time as the renewal. Note that you may need to check with the permitting authority to determine if they are holding any permit modification requests you have submitted for processing with an upcoming permit renewal.

#### Other Adjustments

The purpose of this section is to adjust the emissions-based to determine the total fee (after adjustments) that is due to the EPA. The emissions fee determined on line 21 is adjusted by the GHG fee adjustment, any amounts of overpayment or underpayment related to a previous fee submittal, and to correct for any fee assessment errors.

Fee assessment errors occur when the permitting authority determines that the source has calculated the fee incorrectly. If this occurs, you will be notified of the error. Any overpayment will be credited against the next fee owed. In the case of underpayment, you will be billed for the corrected fee and you will have 30 days to remit the amount. If you think the assessed fee is in error, you may submit a written explanation of the alleged error, but you must pay the fee. The permitting authority will provide a determination in 90 days. If the assessment of underpayment is in error, your account will be credited.

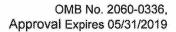
#### Fee Payment

See form FF (the Fee Filing form) for instructions on how to make fee payment to the EPA.

#### **Penalties and Interest**

The permitting authority will bill sources for appropriate penalties and interest for late payment or excessive underpayment of fees. Interest will be assessed on payments received later than the due date. Penalties shall be assessed if payment is not paid within 30 days of the due date. For sources issued with issued permits, penalties and interest shall be assessed for excessive underpayment of the annual fee amount.

END





## Federal Operating Permit Program (40 CFR Part 71) FEE FILING FORM (FF)

The purpose of this form is to ensure that fee payments made by check are credited to the proper facility and to the proper government account. Send this form, along with form **FEE** and the check, to the appropriate lockbox bank address listed on the following page. This form is required whenever you pay by check, including for initial and annual fee payments. Part 71 fees may be paid by check or electronically, and further information on making payments by check or electronically is provided on the following page.

| Source or Facility Name <u>Texas Gulf Terminals Inc.</u>  |
|---|
| Source Location Site is approximately 14 miles offshore the coast of Texas, Southeast of Corpus Christi. Latitude N27° 28' 42.6" and Longitude W97° 00' 48.43". |
| EPA Region where Source Located 6   |
| Mailing Address:  |
| Street/P.O. Box 1401 McKinney, Suite 1500   |
| City Houston  |
| State <u>TX</u> ZIP <u>77010</u>  |
| Contact Person: Denise Rogers   |
| Title: Compliance Manager   |
| Telephone ( <u>832</u> ) <u>203</u> - <u>6493</u> Ext   |
| Total Fee Payment Remitted: \$0   |

#### TWO PAYMENT OPTIONS FOR PART 71 FEES:

#### OPTION 1 - CHECK PAYMENT VIA U.S. POSTAL SERVICE

- Fee payment shall be in U.S. currency drawn on a U.S. bank.
- Check should be made out to the order of the "U.S. Environmental Protection Agency."
- Indicate on the check that the payment is for "Part 71 Fee Payment."
- Make a photocopy of the check.
- Send the following to the EPA region (or delegate agency):
  - √ Form FEE (EPA Form 5900-03) and
  - ✓ Photocopy of check
- Send the following to one of the addresses below:
  - √ Form FF (EPA Form 5900-06) and
  - ✓ Original check

| Address for Regular Mail (U.S. Postal Service):   | Address for Express Delivery (or If Physical Address is Required):  |
|---|---|
| U.S. EPA<br>FOIA and Misc. Payments<br>Cincinnati Finance Center<br>PO Box 979078<br>St. Louis, MO 63197-9000 | U.S. Bank Government Lockbox 979078 US EPA FOIA & Misc. Payments 1005 Convention Plaza Mail Station SL-MO-C2-GL St. Louis, MO 63101 |

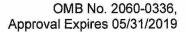
- Tips for Completing form FF (Fee Filing Form)
  - o Source Location: Physical location Street address (if any), City, County, and State.
  - Mailing Address: Address for the EPA to send correspondence. This address may be different from the source location, such as a corporate office.
  - o EPA Region: EPA region in which the source is located (e.g., EPA Region 8).
  - o Contact: Person that can best answer questions concerning fee payment.

#### **OPTION 2 – ONLINE PAYMENT**

- Part 71 fees can be paid online at <u>www.pay.gov</u> using form "SFO 1.1 (EPA Miscellaneous Payments Cincinnati Finance Center)." Note that EPA Form 5900-06 cannot be used for online payments.
- Tips for completing online form SFO 1.1:
  - o From the "Type of Payment" drop down menu, select "Other/Miscellaneous"
  - o On the "Bill# or description" line, enter "Part 71 Fee Payment"
  - o In the "Comments" box, enter the source or facility name and the part 71 permit number associated with this payment.
- After submitting payment online, send the following to the EPA region (or delegate agency):
  - o Form FEE (EPA Form 5900-03) and
  - o Copy of the electronic payment confirmation generated by the online payment system.
- FOR MORE INFORMATION: The following link provides detailed information on how to make payments to EPA for part 71 fees, penalties, and interest, including contact information for EPA's Accounts Receivable Branch in Cincinnati <a href="https://www.epa.gov/financial/makepayment">https://www.epa.gov/financial/makepayment</a>

Contacts: Craig Steffen (US EPA Finance): 513-487-2091

Natalie Pearson (U.S. Bank): 314-418-4087





Federal Operating Permit Program (40 CFR Part 71)
INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION (I-COMP)

#### SECTION A - COMPLIANCE STATUS AND COMPLIANCE PLAN

Complete this section for each unique combination of applicable requirements and emissions units at the facility. List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Indicate your compliance status at this time for this requirement and compliance methods and check "YES" or "NO" to the follow-up question.

| Emission Unit ID(s): LOADFUG   |
|--|
| Applicable Requirement (Describe and Cite)   |
| N/A  |
| Compliance Methods for the Above (Description and Citation):   |
| N/A  |
| Compliance Status:  In Compliance: Will you continue to comply up to permit issuance?YesNo Not In Compliance: Will you be in compliance at permit issuance?YesNo  Future-Effective Requirement: Do you expect to meet this on a timely basis? Yes No |
| Future-Effective Requirement: Do you expect to meet this on a timely basis?YesNo   |
|  |
| Emission Unit ID(s):   |
| Emission Unit ID(s): Applicable Requirement (Description and Citation):  |
|  |
| Applicable Requirement (Description and Citation):   |
| Applicable Requirement (Description and Citation):  Compliance Methods for the Above (Description and Citation):   |
| Applicable Requirement (Description and Citation):  Compliance Methods for the Above (Description and Citation):  Compliance Status:   |

I-COMP 2

#### **B. SCHEDULE OF COMPLIANCE**

| Complete this section if you answered "NO" to any of the questions in section A section if required to submit a schedule of compliance by an applicable requirer copies of any judicial consent decrees or administrative orders for this requirem  | ment. Please attach                                      |
|---|--|
| Unit(s)Requirement  |  |
| Reason for Noncompliance. Briefly explain reason for noncompliance at time that future-effective requirement will not be met on a timely basis:   | e of permit issuance or                                  |
| Narrative Description of how Source Compliance Will be Achieved. Briefl achieving compliance:   | y explain your plan for                                  |
| Schedule of Compliance. Provide a schedule of remedial measures, includir sequence of actions with milestones, leading to compliance, including a date for  |  |
| Remedial Measure or Action  | Date to be Achieved                                      |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
|   |  |
| C. SCHEDULE FOR SUBMISSION OF PROGRESS REPORTS  Only complete this section if you are required to submit one or more schedules of complicable requirement requires submittal of a progress report. If a schedule of comprogress report should start within 6 months of application submittal and subsequent nonths. One progress report may include information on multiple schedules of compress report may include information on multiple schedules. | pliance is required, your<br>tly, no less than every six |
| Contents of Progress Report (describe):   |  |
| First Report// Frequency of Submittal   |  |
| Contents of Progress Report (describe):   |  |
| First Report// Frequency of Submittal   |  |

I-COMP

Enhanced Monitoring Requirements:

Compliance Certification Requirements:

D. SCHEDULE FOR SUBMISSION OF COMPLIANCE CERTIFICATIONS

### 

In Compliance

\_ In Compliance

Not In Compliance

Not In Compliance

3

# INSTRUCTIONS FOR I-COMP INITIAL COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

#### Section A (Compliance Status and Compliance Plan)

<u>Description of Applicable Requirement</u>: Complete Section A for each unique combination of applicable requirements (emission limitations, standards or other similar requirements of federal rules, SIP, TIP, FIP, or federally-enforceable permits) that apply to particular emissions units. You will likely have to complete this section numerous times to include all requirements at all emission units.

The emissions unit ID(s) should be the ones defined in section I of form GIS. If the requirement, including compliance method, applies in the same way to multiple emission units, you may list multiple units for a particular requirement.

The descriptions here should be detailed to the individual requirement level, rather than the standard level (if a MACT applies to you, describe each requirement of the MACT, rather than just a citation to the MACT as a whole). If the requirement imposes a particular numerical limit or range, include that in your description.

Citations to the requirements should unambiguously identify the requirement to the lowest level necessary.

<u>Compliance Methods</u>: List all compliance methods (monitoring, recordkeeping and reporting) you used to determine compliance with the applicable requirement described above. Such methods may be required by the applicable requirements or performed for other reasons. List all compliance methods required by applicable requirements, whether you used them to determine compliance or not.

To describe monitoring, indicate the monitoring device, the equipment, process, or pollutant monitored, averaging time, frequency, and a citation or cross-reference to the requirement. To describe recordkeeping, describe the records kept, the frequency of collection, and include a citation or cross-reference to the requirement. Please indicate whether monitoring data, results, or other records kept for compliance purposes may be kept on-site rather than reported. To describe reporting requirements, describe what is reported, when it is reported, and cite or cross-reference the requirement.

The citation or cross-reference here must unambiguously identify the requirement to the lowest level necessary.

Note that Compliance Assurance Monitoring (CAM) under part 64 is also an applicable requirement that may impose compliance methods for title V sources and require the submittal of a CAM plan with this application. Also note that periodic monitoring (which may be monitoring or recordkeeping designed to serve as monitoring) under part 71 may be required in certain limited circumstances: when there is no monitoring required, monitoring is required but there is no frequency specified, or only a one-time test is required. You may propose periodic monitoring in your application, but the permitting authority will make the final decision. If you wish to propose periodic monitoring, please do so in an attachment that clearly identifies the requirements, the units they apply to, and what you propose for periodic monitoring.

Compliance Status: For each requirement and associated compliance methods described above, indicate whether you are in compliance, not in compliance, or it is a future-effective requirement (only check one). This is with respect to your compliance status at the time of application submittal. You should consider all available information or knowledge that you have when evaluating your compliance status, including reference test methods and other compliance requirements that are required directly by a statute, regulation, or permit and "credible evidence" (e.g., non-reference test methods and other information "readily available" to you and already being utilized by you). For each compliance status indication, you must answer "YES" or "NO" as to your expectations for continuing (or future) compliance. If you answer "NO" to any of these questions, you will have to complete the schedule of compliance section (section B).

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#### Section B (Schedule of Compliance)

Complete this section if you answered "NO" to any of the questions in section A. Regardless of how you answered the questions in section A, complete this section if required to have a schedule of compliance by an applicable requirement, or if a judicial consent decree or administrative order includes a schedule of compliance.

Identify the applicable requirement using the same information you used in section A. Provide a brief explanation of the reason for noncompliance (either now or in the future). [e.g., "do not have control device required as BACT."] Next, provide a brief description of what the schedule of compliance is trying to achieve. Then in the table provided, include a detailed schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the applicable requirement. This schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance must be supplemental to, and not sanction noncompliance with, the applicable requirements on which it is based. For each remedial measure, provide the date by which the action will be completed. This schedule or one approved by the permitting authority will be included in the permit.

Lastly, attach a copy of any judicial consent decrees or administrative orders for which you are providing a schedule of compliance.

#### Section C (Schedule for Submission of Progress Reports)

If you must submit one or more schedules of compliance (specified in section B), or if an applicable requirement requires submittal of a progress report, complete this section. Progress reports describe your progress in meeting the milestone dates for the remedial measures required by the schedule of compliance. Progress reports must be submitted at least every 6 months, but specific applicable requirements may require them more frequently. One progress report may include information on one or more schedules of compliance. Describe the contents of the progress report, including the date that your facility will begin submitting them and the frequency they will be submitted.

#### Section D (Schedule for Submission of Compliance Certifications)

All applicants must complete this section. Compliance certifications must be submitted at least every year unless the applicable requirement or EPA requires them more frequently. Provide the date when the first compliance certification will be sent.

#### Section E (Compliance Status for Enhanced Monitoring and Compliance Certification)

All applicants must complete this section. The completion of this section does not satisfy the requirement for the responsible official to submit a certification of truth, accuracy, and completeness (instead, this is met by completing form CTAC and submitting it with the other forms you send to EPA).

To certify compliance with "Enhanced Monitoring," you must be in compliance at all emission units with CAM and "Periodic Monitoring" [required by 40 CFR 71.6(a)(3)(i)(B)], if they apply. "Compliance Certification Requirements" include requirements for compliance certification in title V applications and permits, and possibly through applicable requirements (e.g., certain MACT standards). If you have fully completed sections A - E of this form, you will be in compliance with the compliance certification requirement for applications. If you do not have a title V permit at this time, you can assume you are in compliance with the compliance certification requirements for permits and with periodic monitoring requirements. If you indicate you are "not in compliance" with either of these requirements, attach an explanation.

END



OMB No. 2060-0336, Approval Expires 05/31/2019

### Federal Operating Permit Program (40 CFR Part 71) CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

| -                                       | A. Responsible Official   |
|---|---|
| *************************************** | Name: (Last) Rogers (First) Denise (MI)   |
| *************************************** | Title Compliance Manager  |
| *************************************** | Street or P.O. Box 1401 McKinney, Suite 1500  |
| -                                       | City <u>Houston</u> State <u>TX</u> ZIP <u>77010</u>  |
| -                                       | Telephone (832) 203 - 6493 Ext. Facsimile (832) 203 - 6401  |
|   | B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)   |
|   | I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete. |
| Constitution of the last                | Name (signed) Dense Voges   |
| -                                       | Name (typed) <u>Denise Rogers</u> Date: <u>し / 2구 / 2016</u>  |
| -                                       |   |

CTAC 2

### INSTRUCTIONS FOR CTAC CERTIFICATION OF TRUTH, ACURACY, and COMPLETENESS

#### Information Collection Burden Estimates

The public reporting and recordkeeping burden for this collection of information is estimated to average 247 hours per respondent per year. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

#### **DETAILED INSTRUCTIONS**

This form is for the responsible official to certify that submitted documents (i.e., permit applications, updates to application, reports, and any other information required to be submitted as a condition of a permit) are true, accurate, and complete.

This form should be completed and submitted with each set of documents sent to the permitting authority. It may be used at time of initial application, at each step of a phased application submittal, for application updates, as well as to accompany routine submittals required as a term or condition of a permit.

**Section A** - Title V permit applications must be signed by a responsible official. The definition of responsible official can be found at 40 CFR 70.2.

**Section B** - The responsible official must sign and date the certification of truth, accuracy and completeness. This should be done after all application forms are complete and the responsible official has reviewed the information. Normally this would be the last form completed before the package of forms is mailed to the permitting authority.



### TCEQ Core Data Form

| TC | EQ | Use | Only |  |
|----|----|-----|------|--|
|    |    |     |      |  |
|    |    |     |      |  |
|    |    |     |      |  |
|    |    |     |      |  |
|    |    |     |      |  |
|    |    |     |      |  |

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175. SECTION I: General Information

| SECTION I: General Informati  | on                        |  |           |   |   |                  |   |                       |                          |
|---|---------------------------|--|-----------|---|---|------------------|---|-----------------------|--------------------------|
| 1. Reason for Submission (If other i  | 1.5%                      |  | 100       |   | 100                                     | th tha           | rossom poplicatio                       | n \                   |                          |
| New Permit, Registration or Autr  |                           |  |           |   |   |                  | лодгант аррысацо                        | 11.)                  | 4,770770 7777            |
| Renewal (Core Data Form short   |                           | th the rene                                | wal for   | m)                                      |   | Other            | I I I I I I I I I I I I I I I I I I I   |                       | or: n                    |
| 2. Customer Reference Number (if iss  | sued)                     | Follow this                                |           |   |   | ≺egula           | ted Entity Referen                      | ce Number (           | if issued)               |
| CN 605490085  |                           | for CN or RN numbers in Central Registry** |           |   | F                                       | N.               | *************************************** |                       |                          |
| SECTION II: Customer Information  |                           |  |           |   |   |                  |   |                       |                          |
| 4. General Customer Information   | 5. Effective Da           | ate for Cust                               | omer l    | nforma                                  | tion Up                                 | dates            | (mm/dd/yyyy)                            |                       |                          |
| New Customer  | •                         | date to Cu                                 |           |   |   | rollar o         | •                                       | -                     | Entity Ownership         |
| Change in Legal Name (Verifiable The Customer Name submitte   |                           |  |           |   |   |                  |   |                       | active with the          |
| Texas Secretary of State (SO  |                           |  |           |   |   |                  |   | ., 0,,,, 6,,,         | W. C. 2                  |
| 6. Customer Legal Name (If an individual  | ual, print last name fir  | st: e.g.: Doe                              | , John)   |   | <u>I</u>                                | new Cu           | istomer, enter previ                    | ous Custom            | er below:                |
| Texas Gulf Terminals Inc.   |                           |  |           |   |   |                  |   |                       |                          |
| 7. TX SOS/CPA Filing Number   | 8. TX State Ta            |  | s)        |   | 9.                                      | Feder            | al Tax ID (9 digits)                    | 10. DUN               | S Number (if applicable) |
| 0802978324  | 3206671569                | 92   |           |   |   |                  |   |                       |                          |
| 11. Type of Customer: 🗵 Corpo   | ration                    |  | Individ   | lual                                    |   | Pa               | ırtnership: 🔲 Gener                     | al 🔲 Limited          |                          |
| Government: City County Fede  | ral State Other           |  | Sole F    | ropriet                                 | orship                                  |                  | Other:                                  |                       |                          |
| 12. Number of Employees   |                           |  |           | *************************************** |   |                  | pendently Owned                         | and Operate           | d?                       |
| <b>№</b> 0-20   | 251-500                   | 501 ar                                     | ıd high   | er                                      | <u> </u>                                | Yes              | ☐ No                                    |                       |                          |
| 14. Customer Role (Proposed or Actua  | l) - as it relates to the | e Regulated                                | Entity li | sted on                                 | this for                                | n. Pleas         | se check one of the f                   | ollowing:             |                          |
| }   | erator<br>sponsible Party | 1  |           | & Opera                                 |   | plicant          | ☐Other:                                 |                       |                          |
| 1401 McKinney   |                           | NATURAL CONTRACTOR                         |           |   |   |                  | *************************************** | ********************* |                          |
| 15. Mailing Address: Suite 1500   |                           | •••••                                      |           | ••••••                                  |   |                  |   |                       |                          |
| City Houston  |                           | State                                      | TX        |   | ZIP                                     | 770 <sup>-</sup> | 10                                      | ZIP+4                 |                          |
| 16. Country Mailing Information (if outs  | ide USA)                  |  |           | 17. E                                   | -Mail A                                 | Address          | 3 (if applicable)                       |                       |                          |
| 40 Marie 1000000 04   | 2. 6                      |  |           |   |   |                  |   |                       |                          |
| 18. Telephone Number  | 1                         | 19. Extension                              | on or C   | ode                                     | *************************************** |                  | 20. Fax Number                          | (if applicab          | le)                      |
| ( 832 ) 203 - 6400  |                           | 20 20                                      |           |   |   |                  | ( )                                     |                       |                          |
| SECTION III: Regulated Entity Information   |                           |  |           |   |   |                  |   |                       |                          |
| 21. General Regulated Entity Information (If `New Regulated Entity" is selected below this form should be accompanied by a permit application)              |                           |  |           |   |   |                  |   |                       |                          |
| New Regulated Entity Update to Regulated Entity Name Update to Regulated Entity Information   |                           |  |           |   |   |                  |   |                       |                          |
| The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC). |                           |  |           |   |   |                  |   |                       |                          |
| 22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)  |                           |  |           |   |   |                  |   |                       |                          |
|   |                           |  |           |   | *************************************** | ~~~~~~~~~        | *************************************** |                       |                          |
| Texas Gulf Terminals Project  |                           |  |           |   |   |                  |   |                       |                          |

| 23. Street Address of the  |   |                             |                                |                         |                                |   |   |   |
|--|---|-----------------------------|--------------------------------|-------------------------|--------------------------------|---|---|---|
| Regulated Entity:<br>(No PO Boxes)   |   |                             | T T                            |                         | Ť                              | ······                                  |   | . 1                                     |
| `  | City  | State                       | <u> </u>                       | ZIP                     |                                |   | ZIP+                                    | 4                                       |
| 24. County   |   |                             |                                |                         |                                |   |   |   |
|  | Enter Physical  | Location Description        | n if no street a               | address is              | provided.                      |   |   |   |
| 25. Description to<br>Physical Location:   | Physical Location: Site is approximately 14 miles offshore the coast of Texas, Southeast of Corpus Christi, |                             |                                |                         |                                |   |   |   |
| 26. Nearest City   |   |                             |                                |                         | State                          |   |   | Nearest ZIP Code                        |
| N/A  |   |                             |                                |                         | TX                             |   |   | N/A                                     |
| 27. Latitude (N) In Decima   | ,   |                             |                                | gitude (W)              |                                |   | 7.013453                                |   |
| Degrees  | Minutes   | Seconds                     | Degrees                        | ****                    | Min                            | utes                                    | Seco                                    | *************************************** |
| 27   | 28  | 42.6                        | 97                             |                         | 00                             |   | 48.4                                    |   |
| 29. Primary SIC Code (4 digi   | its) 30. Secondary SIC  | Code (4 digits)             | 31. Primary<br>(5 or 6 digits) | NAICS Co                | ode                            | 32. Sed<br>5 or 6                       |   | AICS Code                               |
| 4612   | 201940  | 3300                        | 486910                         |                         |                                |   |   |   |
| 33. What is the Primary Bus  |   | ot repeat the SIC or NAI    | CS description.)               |                         |                                |   | 7737777778                              |   |
| Offshore Marine Termi  | ·   |                             | irai josirairai arairai        | ratratratratrat tra     | 4004004004004004               |   | *************************************** |   |
| 24 84-11   | 1401 McKinney   |                             | 0.000                          |                         |                                | ······································  |   |   |
| 34. Mailing<br>Address:  | Suite 1500  |                             |                                |                         |                                |   |   |   |
| Addiess.   | City Houston  | State                       | TX                             | ZIP                     | 77010                          |   | ZIP -                                   | +4                                      |
| 35. E-Mail Address:  |   |                             |                                |                         |                                |   |   |   |
| 36. Telepho  | one Number  | 37. Extens                  | 37. Extension or Code          |                         | 38. Fax Number (if applicable) |   |   | cable)                                  |
| (832)2   |   |                             |                                | ( ) ~                   |                                |   |   |   |
| 39. TCEQ Programs and ID Num<br>Form instructions for additional guil  |   | te in the permits/registrat | ion numbers that               | t will be affect        | ted by the upd                 | lates subm                              | itted on this                           | form. See the Core Data                 |
| Dam Safety   | Districts   | Edwards Aquifer             |                                | Emissions Inventory Air |                                | itory Air                               | Indust                                  | rial Hazardous Waste                    |
|  |   |                             |                                |                         |                                | *************************************** | *************************************** |   |
| Municipal Solid Waste  | New Source Review   | Air OSSF                    | OSSF                           |                         | eum Storag                     | e Tank                                  | ☐ PW                                    | S                                       |
|  |   |                             |                                |                         |                                |   |   |   |
| Sludge   | Storm Water   | ▼ Title V Air               |                                |                         |                                | Use                                     | od Oil                                  |   |
|  |   |                             | a A seign Ib year              | - 16/a                  | ne Diabta                      |   | ——————————————————————————————————————  |   |
| ☐ Voluntary Cleanup  | ☐ Waste Water   |                             | r Agriculture                  | vvai                    | er Rights                      |   | Othe                                    | f.                                      |
|  |   |                             |                                | <u> </u>                |                                |   |   | 10 1001                                 |
| SECTION IV: Preparer   | Information   |                             |                                |                         |                                |   |   |   |
| 40. Name: Denise Rogers  |   |                             |                                | 41. Title:              | Complian                       | ce Mana                                 | ger                                     |   |
| 42. Telephone Number   | 44. Fax Numb  | er                          | 45. E-Ma                       | iil Address             |                                |   |   |   |
| (832)203-6493  | ( )   | · •                         | denise.ro                      | gers@texa               | asgulfterr                     | minals.cor                              | n                                       |   |
| SECTION V: Authorized Signature  46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39. |   |                             |                                |                         |                                |   |   |   |
| Company: Texas Gulf T  | erminals Inc  |                             |                                | Job Title:              | Complian                       | ce Mana                                 | ger                                     |   |
| Name(In Print): Denise Roge  | PIĘ   |                             |                                | Phone:                  | (832)2                         | 03 - 649                                | 3                                       |   |
| Signatura  | V   |                             |                                | Date:                   | Ic/ol                          | 1001                                    | [                                       | ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, |
| Olgridate.   | <del></del>   |                             |                                | <u> </u>                |                                | There !                                 | 4)                                      | 1000                                    |

Important Note: The agency requires that a Core Data Form be submitted on all incoming applications unless a Regulated Entity and Customer Reference Number have been issued and no core data information has changed. For more information regarding the Core Data Form, call (512) 239-5175 or go to www.tceq.texas.gov/permitting/central\_registry/guidance.html.

| <u> </u>  |               |                        |                        |  |  |  |
|---|---------------|------------------------|------------------------|--|--|--|
| I. Applicant Information  |               |                        |                        |  |  |  |
| A. Company or Other Legal Name: Texas Gulf Terminals Inc.   |               |                        |                        |  |  |  |
| Texas Secretary of State Charter/Registration Number  | er (if applic | cable):                |                        |  |  |  |
| B. Company Official Contact Information: ( Mr. [  | ☐ Mrs. 🗵      | Ms. Other:)            |                        |  |  |  |
| Name: Denise Rogers   |               |                        |                        |  |  |  |
| Title: Compliance Manager   |               |                        |                        |  |  |  |
| Mailing Address: 1401 McKinney, Suite 1500  |               |                        |                        |  |  |  |
| City: Houston   | State: T      | ΓX                     | ZIP Code: 77010        |  |  |  |
| Telephone No.: 832-203-6493   | Fax No.       | .: 832-203-6401        |                        |  |  |  |
| E-mail Address: denise-rogers@texasgulfterminals.co   | om            |                        |                        |  |  |  |
| All permit correspondence will be sent via electronic of mail. The company official must initial here if hard cop |               |                        |                        |  |  |  |
| C. Technical Contact Name Information: ( Mr.  | ] Mrs. 🖂      | Ms. 🗌 Other:)          |                        |  |  |  |
| Name: Denise Rogers   |               |                        |                        |  |  |  |
| Title: Compliance Manager   |               |                        |                        |  |  |  |
| Company Name: Texas Gulf Terminals Inc  |               |                        |                        |  |  |  |
| Mailing Address: 1401 McKinney, Suite 1500  |               |                        |                        |  |  |  |
| City: Houston   | State: TX     | <                      | ZIP Code: 77010        |  |  |  |
| Telephone No.: 832-203-6493   | Fax No.:      | 832-203-6401           |                        |  |  |  |
| E-mail Address: denise.rogers@texasgulfterminals.co   | om            |                        |                        |  |  |  |
| D. Site Name: Texas Gulf Terminals Project  |               |                        |                        |  |  |  |
| E. Area Name/Type of Facility:  |               |                        | ☑ Permanent ☐ Portable |  |  |  |
| For portable units, please provide the serial number o  | of the equi   | ipment being authorize | ed below.              |  |  |  |
| Serial No:  | S             | erial No:              |                        |  |  |  |
| F. Principal Company Product or Business: Offshore Marine Terminal  |               |                        |                        |  |  |  |
| Principal Standard Industrial Classification Code (SIC): 4612   |               |                        |                        |  |  |  |
| Principal North American Industry Classification System (NAICS): 486910   |               |                        |                        |  |  |  |
| G. Projected Start of Construction Date: TBD  |               |                        |                        |  |  |  |
| Projected Start of Operation Date: TBD  |               |                        |                        |  |  |  |

| l.   | I. Applicant Information (continued)  |   |                     |              |   |   |                      |              |
|------|---|---|---------------------|--------------|---|---|----------------------|--------------|
| H.   | H. Facility and Site Location Information (If no street address, provide clear driving directions to the site in writing.): |   |                     |              |   |   |                      |              |
| Stre | et Address: Sit   | e is approximately                            | 14 miles offshore   | the c        | oast of Texas, South                            | east                                    | of Corpus Christi    | e .          |
|      |   |   |                     | ************ |   |   |                      |              |
| City | City/Town: N/A County: N/A ZIP Code: N/A  |   |                     |              |   |   |                      |              |
| Lati | _atitude (nearest second): 27° 28' 42.6" Longitude (nearest second): 97° 00' 48.43"   |   |                     |              |   |   |                      |              |
| I.   | Account Ident   | ification Number (le                          | eave blank if new s | site o       | r facility):                                    | *************************************** |                      |              |
| J.   | Core Data For   | rm  |                     |              |   |   |                      |              |
|      |   | orm (Form 10400) a<br>mber (complete K a      |                     | rovid        | e customer reference                            | num                                     | ber and              | ⊠ YES □ NO   |
| K.   | Customer Ref  | erence Number (Cl                             | <b>V)</b> ;         |              |   |   |                      |              |
| L.   | Regulated En  | tity Number (RN):                             |                     |              |   | *************************************** |                      |              |
| II.  | General In  | formation                                     |                     |              |   |   |                      |              |
| Α.   |   | information submit<br>large red letters at    |                     |              | n? If Yes, mark each<br>ge.                     | confi                                   | dential page         | ☐ YES 🖾 NO   |
| B.   |   |   |                     |              | of violation, or enfor<br>ncy and provide the l |   |                      | ☐ YES 🖾 NO   |
| C.   | Number of Ne  | w Jobs: N/A                                   |                     |              |   |   |                      |              |
| D.   | Provide the na  | ame of the State Se                           | enator and State R  | epre?        | sentative and district                          | num                                     | bers for this facili | ty site:     |
| Stat | te Senator: N/A   |   |                     |              |   |   | District No.: N/A    |              |
| Stat | e Representati  | ve: N/A                                       |                     |              |   |   | District No.: N/A    |              |
| III. | Type of Po  | ermit Action Requ                             | ested               |              |   |   |                      |              |
| A.   | Mark the a  | ppropriate box indi                           | cating what type o  | f acti       | on is requested.                                |   |                      |              |
| IJ۱  | nitial  |   | ☐ Amendment         |              | Revision (30 TA                                 | C § 1                                   | 16.116(e)            |              |
|      | Change of Loca  | ation   |                     |              | Relocation                                      | •••••                                   |                      |              |
| B.   | Permit Nur  | mber (if existing):                           | 93.5 97             | ū.           |   |   |                      | 777          |
| C.   |   | ne: Mark the approp<br>that apply, skip for a |                     |              | nat type of permit is r                         | eque                                    | sted.                |              |
|      | Construction  | Flexible                                      | ] Multiple Plant    |              | Nonattainment [                                 | ] Pla                                   | ant-Wide Applica     | bility Limit |
| ים   | Prevention of S   | ignificant Deteriora                          | tion (PSD)          |              | Hazardous Air Polluta                           | int Ma                                  | ajor Source          |              |
|      | PSD for greenhouse gases (GHGs)    Other: Initial Title V Operating Permit  |   |                     |              |   |   |                      |              |

| Ш.  | Type of Permit Action Reque  | sted (continued)      |                          |                          |                      |  |  |
|---|--|-----------------------|--------------------------|--------------------------|----------------------|--|--|
| D.  | <ol> <li>Is a permit renewal application being submitted in conjunction with this amendment in<br/>accordance with 30 TAC § 116.315(c).</li> </ol> |                       |                          |                          |                      |  |  |
| E. Is this application for a change of location of previously permitted facilities?                     |  |                       |                          |                          |                      |  |  |
| If Y  | es, complete all parts of III.E.   |                       |                          |                          |                      |  |  |
| Cur   | rent Location of Facility (If no street  | address, provide cle  | ear driving directions t | o the site in writing.): |                      |  |  |
| Stre  | et Address:  |                       |                          |                          |                      |  |  |
|   |  |                       |                          |                          |                      |  |  |
| City  |  | County:               |                          | ZIP Code:                |                      |  |  |
| Pro   | posed Location of Facility (If no stre   | et address, provide   | clear driving direction  | s to the site in writing | . <b>)</b> :         |  |  |
| Stre  | et Address:  |                       |                          |                          |                      |  |  |
|   |  |                       |                          |                          |                      |  |  |
| City  |  | County:               |                          | ZIP Code:                |                      |  |  |
|   | the proposed facility, site, and plot cial conditions? If "NO," attach detail  |                       | t technical requiremer   | nts of the permit        | ☐ YES ☐ NO           |  |  |
| Is th   | ne site where the facility is moving c   | onsidered a major s   | ource of criteria pollut | ants or HAPs?            | ☐ YES ☐ NO           |  |  |
| F.  | Consolidation into this Permit: List permit including those for planned  |                       |                          | mits by rule to be co    | nsolidated into this |  |  |
| List  | : N/A  |                       |                          | 3204 35                  |                      |  |  |
|   |  |                       |                          |                          |                      |  |  |
| G.  | Are you permitting planned mainte  | nance, startup, and   | shutdown emissions?      | )                        | ☐ YES ⊠ NO           |  |  |
| If Y  | es, attach information on any chang  | es to emissions und   | ler this application as  | specified in VII and V   | /III.                |  |  |
| H.  | Federal Operating Permit Require   | ments (30 TAC Cha     | pter 122 Applicability)  |                          |                      |  |  |
| Is th   | nis facility located at a site required (  | to obtain a federal o | perating permit?         | ☑ YES ☐ NO ☐ T           | o be determined      |  |  |
| If Y  | es, list all associated permit number  | (s), attach pages as  | needed).                 |                          |                      |  |  |
| Associated Permit No (s.):  |  |                       |                          |                          |                      |  |  |
|   |  |                       |                          |                          |                      |  |  |
| Identify the requirements of 30 TAC Chapter 122 that will be triggered if this application is approved. |  |                       |                          |                          |                      |  |  |
| ו 🗆   | ☐ FOP Significant Revision ☐ FOP Minor ☐ Application for an FOP Revision   |                       |                          |                          |                      |  |  |
|   | ☐ Operational Flexibility/Off-Permit Notification ☐ Streamlined Revision for GOP   |                       |                          |                          |                      |  |  |
| $\boxtimes$   | ☑ To be Determined ☐ None  |                       |                          |                          |                      |  |  |

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| 4   |   |            |  |  |  |  |
|---|---|------------|--|--|--|--|
| III. Type of Permit Action Requested  | (continued)   |            |  |  |  |  |
| H. Federal Operating Permit Requirement   | H. Federal Operating Permit Requirements (30 TAC Chapter 122 Applicability) (continued) |            |  |  |  |  |
| Identify the type(s) of FOP(s) issued and/or FOP application(s) submitted/pending for the site.  (check all that apply) |   |            |  |  |  |  |
| GOP Issued GC   | P application/revision application submitted or under API                               | ) review   |  |  |  |  |
| SOP Issued SO   | P application/revision application submitted or under APE                               | ) review   |  |  |  |  |
| IV. Public Notice Applicability   |   |            |  |  |  |  |
| A. Is this a new permit application or a cha  | ange of location application?   | ☑ YES ☐ NO |  |  |  |  |
| B. Is this application for a concrete batch   | plant? If Yes, complete all parts of V.D.   | ☐ YES ⊠ NO |  |  |  |  |
| C. Is this an application for a major modifi<br>or exceedance of a PAL permit?  | cation of a PSD, nonattainment, FCAA § 112(g) permit,                                   | ☐ YES ⊠ NO |  |  |  |  |
| D. If this is an application for emissions of   | GHGs, select one of the following:  |            |  |  |  |  |
| separate public notice (requires a separa   | te application) 🖂 consolidated public notic   | ce         |  |  |  |  |
| E. Is this application for a PSD or major m<br>less of an affected state or Class I Area                                | odification of a PSD located within 100 kilometers or<br>a?                             | ☐ YES ⊠ NO |  |  |  |  |
| If Yes, list the affected state(s) and/or Class   | l Area(s),  |            |  |  |  |  |
| List:   |   |            |  |  |  |  |
| F. Is this a state permit amendment applic  | cation? If Yes, complete all parts of IV.F.   |            |  |  |  |  |
| Is there any change in character of emission  | ns in this application?   | ☐ YES ☐ NO |  |  |  |  |
| Is there a new air contaminant in this applica  | ation?  | ☐ YES ☐ NO |  |  |  |  |
| Do the facilities handle, load, unload, dry, m<br>vegetables fibers (agricultural facilities)?                          | anufacture, or process grain, seed, legumes, or   | ☐ YES ☐ NO |  |  |  |  |
| List the total annual emission increases ass (List all that apply and attach additional s                               |   |            |  |  |  |  |
| Volatile Organic Compounds (VOC):   |   | 10001      |  |  |  |  |
| Sulfur Dioxide (SO <sub>2</sub> );  |   |            |  |  |  |  |
| Carbon Monoxide (CO):   |   |            |  |  |  |  |
| Nitrogen Oxides (NO <sub>x</sub> ):   |   |            |  |  |  |  |
| Particulate Matter (PM):  |   |            |  |  |  |  |
| PM 10 microns or less (PM <sub>10</sub> ):  |   |            |  |  |  |  |
| PM 2.5 microns or less (PM <sub>2.5</sub> );  |   |            |  |  |  |  |
| Lead (Pb):  | Lead (Pb):  |            |  |  |  |  |
| Hazardous Air Pollutants (HAPs):  |   |            |  |  |  |  |
| Other speciated air contaminants not listed above:  |   |            |  |  |  |  |

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| V. Public Notice Information (cor   | mplete if applicable    | )                      |                   |                      |  |
|---|-------------------------|------------------------|-------------------|----------------------|--|
| A. Responsible Person: ( Mr. M  | rs. Ms. Other:          | )                      |                   |                      |  |
| Name:   |                         |                        |                   |                      |  |
| Title:  |                         | •                      |                   |                      |  |
| Company Name:   |                         |                        |                   |                      |  |
| Mailing Address:  |                         |                        |                   |                      |  |
| City:   | State:                  |                        | ZIP Code:         |                      |  |
| Telephone No.:  |                         | Fax No.:               |                   |                      |  |
| E-mail Address:   | ·                       |                        | 2017              |                      |  |
| B. Technical Contact: ( Mr. Mrs.  | Ms. Other:)             |                        |                   |                      |  |
| Name:   |                         |                        |                   |                      |  |
| Title:  |                         |                        |                   | 33                   |  |
| Mailing Address;  |                         |                        |                   |                      |  |
| City:   | State:                  |                        | ZIP Code:         |                      |  |
| Telephone No.:  |                         | Fax No.:               |                   |                      |  |
| E-mail Address:   |                         |                        |                   |                      |  |
| C. Name of the Public Place:  | 44                      |                        |                   |                      |  |
| Physical Address (No P.O. Boxes):   |                         |                        |                   |                      |  |
| City:   | County:                 |                        | ZIP Code:         |                      |  |
| The public place has granted authorizati  | on to place the appli   | cation for public viev | ving and copying. | ☐ YES ☐ NO           |  |
| The public place has internet access av   | ailable for the public. |                        |                   | ☐ YES ☐ NO           |  |
| D. Concrete Batch Plants, PSD, and Nonattainment Permits  |                         |                        |                   |                      |  |
| County Judge Information (For Concrete Batch Plants and PSD and/or Nonattainment Permits) for this facility site. |                         |                        |                   |                      |  |
| The Honorable:  |                         |                        |                   |                      |  |
| Mailing Address:  |                         |                        |                   | 990 T. MET 3-9 T. M. |  |
| City: ZIP Code:   |                         |                        |                   |                      |  |

| V. Public Notice Information (co.   | mplete if applicable)  |                           |                     |  |  |  |  |
|---|--|---------------------------|---------------------|--|--|--|--|
| D. Concrete Batch Plants, PSD, ar   | D. Concrete Batch Plants, PSD, and Nonattainment Permits (continued)   |                           |                     |  |  |  |  |
| Is the facility located in a municipality or Concrete Batch Plants)   | s the facility located in a municipality or an extraterritorial jurisdiction of a municipality? <i>(For Doncrete Batch Plants)</i> |                           |                     |  |  |  |  |
| Presiding Officers Name(s):   |  |                           |                     |  |  |  |  |
| Title:  |  |                           |                     |  |  |  |  |
| Mailing Address:  |  |                           |                     |  |  |  |  |
| City:   | State:   | ZIP Code:                 |                     |  |  |  |  |
| Provide the name, mailing address of th   | e chief executive for the location where   | the facility is or will b | e located.          |  |  |  |  |
| Chief Executive:  |  |                           |                     |  |  |  |  |
| Mailing Address:  |  | 20 40 40 A                | 20012000200         |  |  |  |  |
| City:   | State:   | ZIP Code:                 | 122                 |  |  |  |  |
| Provide the name, mailing address of th   | e Indian Governing Body for the location   | n where the facility is   | or will be located. |  |  |  |  |
| Indian Governing Body:  |  |                           |                     |  |  |  |  |
| Mailing Address:  |  |                           |                     |  |  |  |  |
| City:   | State:   | ZIP Code:                 |                     |  |  |  |  |
| Identify the Federal Land Manager(s) fo   | r the location where the facility is or wil  | be located.               |                     |  |  |  |  |
| Federal Land Manager(s):  |  | ć                         |                     |  |  |  |  |
| E. Bilingual Notice   |  |                           |                     |  |  |  |  |
| Is a bilingual program required by the Te   | exas Education Code in the School Dis  | trict?                    | ☐ YES ☐ NO          |  |  |  |  |
| Are the children who attend either the el facility eligible to be enrolled in a bilingu   |  | closest to your           | ☐ YES ☐ NO          |  |  |  |  |
| If Yes, list which languages are required   | by the bilingual program?  |                           | .0000000            |  |  |  |  |
| VI. Small Business Classification   | (Required)   |                           |                     |  |  |  |  |
| A. Does this company (including parent companies and subsidiary companies) have fewer than 100 employees or less than \$6 million in annual gross receipts?  ☐ YES ☑ NO |  |                           |                     |  |  |  |  |
| B. Is the site a major stationary source  | e for federal air quality permitting?  |                           | ⊠ YES □ NO          |  |  |  |  |
| C. Are the site emissions of any regula   | ated air pollutant greater than or equal   | to 50 tpy?                | ⊠ YES □ NO          |  |  |  |  |
| D. Are the site emissions of all regulated air pollutants combined less than 75 tpy? ☐ YES ☐ NO   |  |                           |                     |  |  |  |  |

| VII. Technical Information   |  |                |  |  |  |  |
|--|--|----------------|--|--|--|--|
| A. The following information must be submitted with your Form PI-1  (this is just a checklist to make sure you have included everything) |  |                |  |  |  |  |
| ☑ Current Area Map   |  |                |  |  |  |  |
| ⊠ Plot Plan  |  |                |  |  |  |  |
| ⊠ Existing Authorizations  |  |                |  |  |  |  |
| ☑ Process Flow Diagram   |  |                |  |  |  |  |
| ☑ Process Description  |  |                |  |  |  |  |
| Maximum Emissions Data and Calculations  |  |                |  |  |  |  |
| ☑ Air Permit Application Tables  |  |                |  |  |  |  |
| ☐ Table 1(a) (Form 10153) entitled, Emission Point Summa   | ry   | ī              |  |  |  |  |
| ☐ Table 2 (Form 10155) entitled, Material Balance  |  |                |  |  |  |  |
| Other equipment, process or control device tables  |  |                |  |  |  |  |
| B. Are any schools located within 3,000 feet of this facility?   |  | ☐ YES ⊠ NO     |  |  |  |  |
| C. Maximum Operating Schedule:   |  |                |  |  |  |  |
| Hour(s): 24  | Day(s): 365  |                |  |  |  |  |
| Week(s): 52  | Year(s):   | 15             |  |  |  |  |
| Seasonal Operation? If Yes, please describe in the space pr  | ovide below.   | ☐ YES ⊠ NO     |  |  |  |  |
|  |  |                |  |  |  |  |
| Hour(s):   | Day(s);  |                |  |  |  |  |
| Week(s):   | Year(s);   |                |  |  |  |  |
| D. Have the planned MSS emissions been previously subminventory?   | nitted as part of an emissions   | ☐ YES ⊠ NO     |  |  |  |  |
| Provide a list of each planned MSS facility or related activity included in the emissions inventories. Attach pages as need              |  | ties have been |  |  |  |  |
| MSS Facility(s) or Activity  | Year(s)  |                |  |  |  |  |
|  |  |                |  |  |  |  |
|  |  |                |  |  |  |  |
|  |  |                |  |  |  |  |
|  |  |                |  |  |  |  |
| E. Does this application involve any air contaminants for w  | . Does this application involve any air contaminants for which a disaster review is required? ☐ YES ☑ NO |                |  |  |  |  |
| If Yes, list which air contaminants require a disaster review.   |  |                |  |  |  |  |
|  |  |                |  |  |  |  |

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| ************   |  |                    |  |  |  |  |  |
|--|--|--------------------|--|--|--|--|--|
| VII.   | Technical Information <i>(continued)</i>   |                    |  |  |  |  |  |
| F.   | Does this application include a pollutant of concern on the Air Pollutant Watch List (APWL)?   | ☐ YES ⊠ NO         |  |  |  |  |  |
| G.   | Are emissions of GHGs associated with this project subject to PSD?   | ☐ YES ⊠ NO         |  |  |  |  |  |
| If "y  | es," provide a list of all associated applications for this project:   |                    |  |  |  |  |  |
| See  | attachments  |                    |  |  |  |  |  |
| VIII.  | /III. State Regulatory Requirements Applicants must demonstrate compliance with all applicable state regulations to obtain a permit or amendment. The application must contain detailed attachments addressing applicability or non-applicability; identify state regulations; show how requirements are met; and include compliance demonstrations. |                    |  |  |  |  |  |
| A.   | Will the emissions from the proposed facility protect public health and welfare, and comply with all rules and regulations of the TCEQ?  | ⊠ YES □ NO         |  |  |  |  |  |
| B.   | Will emissions of significant air contaminants from the facility be measured?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| C.   | Is the Best Available Control Technology (BACT) demonstration attached?  | ⊠ YES □ NO         |  |  |  |  |  |
| D.   | Will the proposed facilities achieve the performance represented in the permit application as demonstrated through recordkeeping, monitoring, stack testing, or other applicable methods?  | ⊠ YES □ NO         |  |  |  |  |  |
| IX.  | Federal Regulatory Requirements Applicants must demonstrate compliance with all applicable federal regulations to obta amendment. The application must contain detailed attachments addressing applicability or re identify federal regulation subparts; show how requirements are met; and include compliance                                       | non-applicability; |  |  |  |  |  |
| A.   | Does Title 40 Code of Federal Regulations Part 60, (40 CFR Part 60) New Source Performance Standard (NSPS) apply to a facility in this application?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| В.   | Does 40 CFR Part 61, National Emissions Standard for Hazardous Air Pollutants (NESHAP) apply to a facility in this application?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| C.   | Does 40 CFR Part 63, Maximum Achievable Control Technology (MACT) standard apply to a facility in this application?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| D.   | Do nonattainment permitting requirements apply to this application?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| E.   | Do prevention of significant deterioration permitting requirements apply to this application?  | ⊠ YES □ NO         |  |  |  |  |  |
| F.   | Do Hazardous Air Pollutant Major Source [FCAA § 112(g)] requirements apply to this application?  | ⊠ YES □ NO         |  |  |  |  |  |
| G.   | Is a Plant-wide Applicability Limit permit being requested?  | ☐ YES ⊠ NO         |  |  |  |  |  |
| Χ.   | Professional Engineer (P.E.) Seal  |                    |  |  |  |  |  |
| Is th  | Is the estimated capital cost of the project greater than \$2 million dollars?   ☐ YES ☐ NO  |                    |  |  |  |  |  |
| If Yes, submit the application under the seal of a Texas licensed P.E. |  |                    |  |  |  |  |  |

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| XI. Permit Fee Information  |                  |  |  |  |  |
|---|------------------|--|--|--|--|
| Check, Money Order, Transaction Number, ePay Voucher Number: N/A  |                  |  |  |  |  |
| Fee Amount: \$ N/A  |                  |  |  |  |  |
| Paid online? N/A  | ☐ YES ☐ NO       |  |  |  |  |
| Company name on check:  |                  |  |  |  |  |
| Is a Table 30 (Form 10196) entitled, Estimated Capital Cost and Fee Verification, attached?   | ☐ YES ☐ NO ⊠ N/A |  |  |  |  |
| XII. Delinquent Fees and Penalties  |                  |  |  |  |  |
| This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/fees/delin.   |                  |  |  |  |  |
| XIII. Signature   | .10              |  |  |  |  |
| The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA) the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties. |                  |  |  |  |  |
| Name: Denise Rogers   |                  |  |  |  |  |
| Signature: Original Signature Required  |                  |  |  |  |  |
| Date: (0)210)2018   |                  |  |  |  |  |

#### 5.1. PROCESS DESCRIPTION

The proposed SPM buoy system will enable Very Large Crude Carriers (VLCCs) to be fully and completely loaded directly with crude oil/condensate from the SPM. The crude oil/condensate will be supplied to the SPM buoy system from the Onshore Storage Terminal Facility (OSTF), through a pipeline infrastructure, and to the SPM buoy system. Two (2) 30-inch-diameter pipelines will each be capable of 30,000 bph flow rate allowing an overall system crude oil/condensate delivery capacity of 60,000 bph to vessels moored at the proposed SPM buoy system. Vessels will be moored to the proposed SPM buoy system via mooring hawsers. Crude oil will be routed from subsea PLEM via two 24-inch ID flexible hoses to SPM buoy. Floating hoses will extend from the SPM buoy system to the moored vessel to allow for the loading of crude oil/condensate. The project will have a crude oil/condensate loading capacity of 60,000 bph and 192 million barrels per year. The project will be able to load up to 96 large vessels per year.

#### 5.2. PROJECT DESCRIPTION

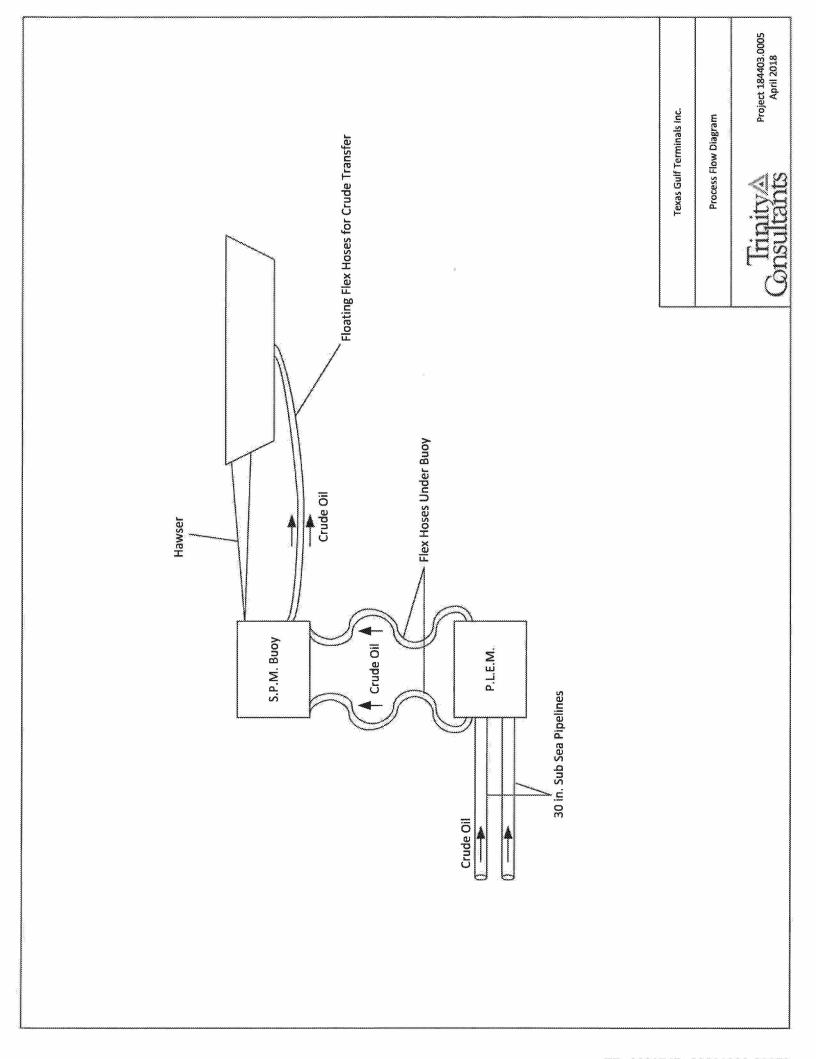
The proposed project includes 14.62 miles of two (2) new paralleling 30-inch diameter offshore pipelines and the DWP.

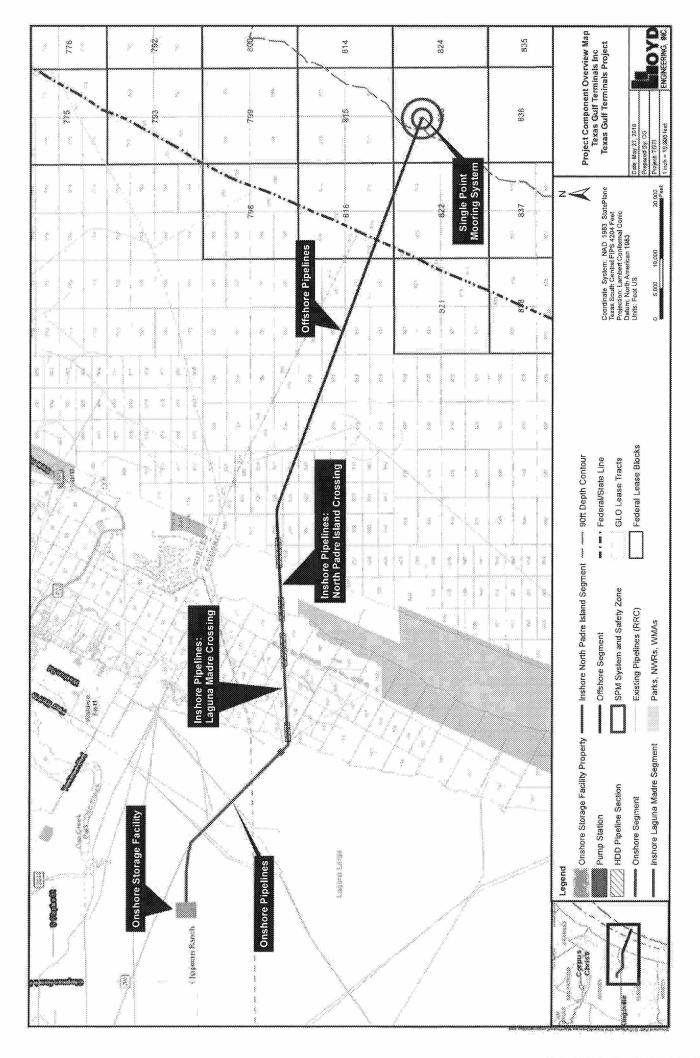
Offshore pipelines - The proposed project requires the ability to export multiple grades of crude oil/condensate. As such, the proposed offshore pipeline infrastructure will comprise a dual pipeline system to allow for the flushing of lines of one crude grade back to the Onshore Storage Terminal Facility (OSTF). Under normal operations, the OSTF will pump crude oil/condensate through both offshore pipelines to the PLEM and SPM buoy system for the loading of vessels moored at the DWP.

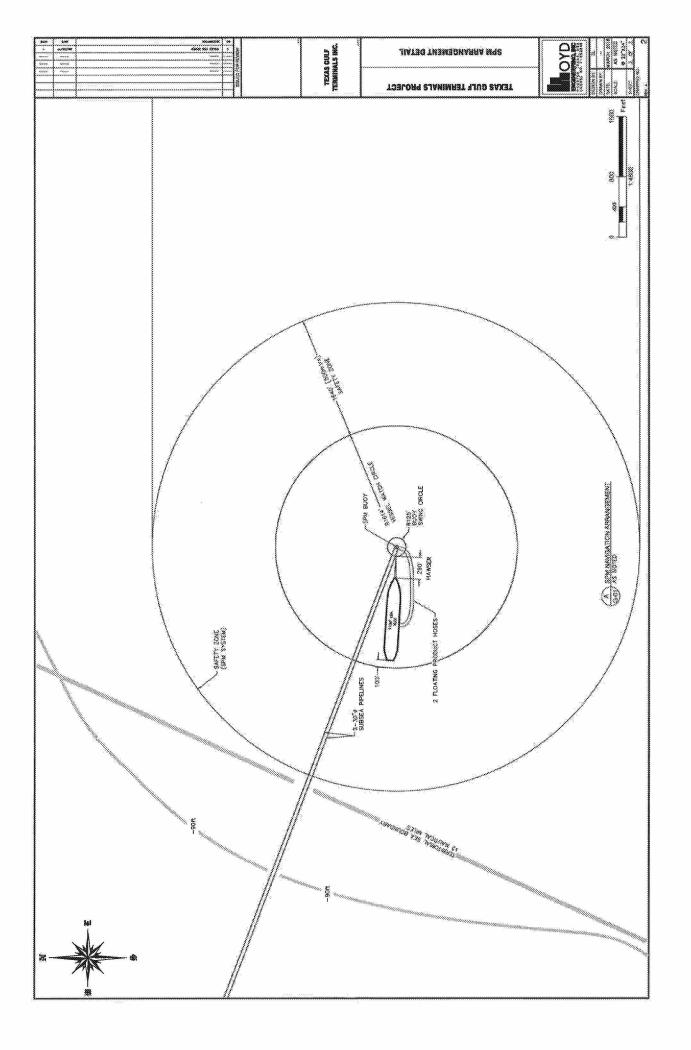
**DWP** - The proposed SPM buoy system will consist of a Pipeline End Manifold (PLEM) system, mooring hawsers, and floating hoses to allow for the loading of crude oil to vessels moored at the proposed SPM buoy system. The proposed SPM buoy system will be of the Catenary Anchor Leg Mooring (CALM) type permanently moored with a symmetrically arranged six-leg anchor chain system extending to pile anchors fixed on the seafloor. The proposed SPM buoy system will consist of inner and outer cylindrical shells subdivided into twelve equal-sized watertight radial compartments. A rotating table will be affixed to the SPM buoy and allow for the connection of moored vessels to the SPM buoy system via mooring hawsers. A series of floating hose strings equipped with marine break-away couplings will be utilized for the transfer of crude oil from the SPM buoy system to the moored vessel. Floating hoses will be equipped with strobe lights (Winkler Lights) at 15-foot intervals for detection at night and periods of low-light. The PLEM system that will serve as the connection point between subsea pipelines and the SPM buoy system through a series of 24-inch-diameter submarine hoses. The PLEM system would be a steel frame structure positioned directly beneath the proposed SPM buoy system and would be anchored directly to the seafloor with piles.

The only primary emissions involved in the proposed project are the VOC emissions resulting from the loading of crude oil/condensate from the SPM buoy system onto a VLCC.

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#### 6.1. EMISSIONS SUMMARY

A summary of proposed emissions is shown in table below.

Table 6-1. Potential Emissions Summary

|                          | NOx<br>(tpy) | CO<br>(tpv) | VOC<br>(tpy) | SO <sub>2</sub> | PM <sub>10</sub> | PM <sub>2.5</sub> | H <sub>2</sub> S                       | H <sub>2</sub> SO <sub>4</sub>                   |
|--------------------------|--------------|-------------|--------------|-----------------|------------------|-------------------|--|--|
|                          |              |             |              |                 |                  |                   |  |  |
| New Sources              |              |             |              |                 |                  |                   | ······································ | harrin da de |
| Loading                  | ***          | **          | 10,808       | 88              |                  | **                | 0.24                                   | : II.ww  |
| Fugitives                | **           | **          | 0.22         | **              | Nin              |                   | ***                                    | ••   |
| Total Project Increases: | **           | **          | 10,808       | **              | **               |                   | 0.24                                   | .**  |

#### 6.2. INFORMATION FOR EMISSION CALCULATIONS

#### 6.2.1. Marine Loading

Emissions from marine loading of crude oil/condensate are calculated based on TCEQ's Air Permit Technical Guidance for Chemical Sources: Loading Operations (October 2000) using the following equation from U.S. EPA's AP-42, Section 5.2:

 $L = 12.46 \times S \times P \times M/T$ 

#### where:

L = Loading Loss (lb/103 gal of liquid loaded)

S = Saturation factor

P = True vapor pressure of liquid loaded (psia)

M = Molecular weight of vapors (lb/lb-mole)

T = Temperature of bulk liquid loaded (R)

A saturation factor of 0.2 is used for submerged loading using ships. A maximum true vapor pressure of 11 psia is used for crude oil/condensate loading.

#### 6.3. POLLUTION CONTROL EQUIPMENT

TGTI proposes to use submerged loading and loading only onto ships which comply with VOC management plan requirements in MEPC.185(59) as control for VOC emissions. A detailed Best Available Control Technology (BACT) analysis is conducted and provided in the New Source Review (NSR) application.

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Table 6-2 - Summary of Proposed BACT (VOC)

| Emission<br>Unit   | Pollutant | BACT Determination  | Proposed BACT<br>Emission Limit | Averaging<br>Period |
|--------------------|-----------|---|---------------------------------|---------------------|
| SPM Buoy<br>System | voc       | Submerged Loading and loading<br>ships which comply with VOC<br>management plan requirements in<br>MEPC.185(59) | N/A                             | N/A                 |

#### 7.1. FEDERAL REQUIREMENTS

The proposed SPM buoy system will be located approximately 14 miles from the coast of Kleberg County. Due to unavailability of attainment/non-attainment information in project area offshore, TGTI proposes to use the attainment status of the nearest County onshore, which is Kleberg County. Kleberg County is considered in attainment or unclassified for all FNSR pollutants. Therefore, the project will not be subject to Non-attainment New Source Review (NNSR), and will only be subject to Prevention of Significant Deterioration (PSD) review if it is determined that emissions of criteria pollutants from the facility will trigger the major source threshold. A major stationary source is defined as either one of the sources identified in 40 CFR 51.166 and which has a PTE of 100 tons or more per year of any regulated pollutant, or any other stationary source which has a PTE of 250 tpy or more of a regulated pollutant. The proposed project is not on the list of 28 source categories listed in 40 CFR 51.166 which have a major source threshold of 100 tpy. Therefore, the proposed project will be subject to PSD if it is determined that emissions form the facility will exceed 250 tpy of any regulated pollutant.

The only FNSR pollutant from the proposed project will be VOC. Based on potential air emissions from the facility, the project will be subject to preconstruction review under the federal PSD regulations since potential VOC emissions will be greater than the 250 ton per year PSD major source threshold. TGTI has submitted an application covering the NSR air permit application requirements under separate cover. The major requirement have been summarized in the following sections.

|                          | NOx<br>(tpy) | CO (tpy)  | VOC<br>(tpy) | SO <sub>2</sub> | PM <sub>10</sub> (tpy) | PM <sub>2,5</sub> | H <sub>2</sub> S<br>(tpy) | H <sub>2</sub> SO <sub>4</sub> |
|--------------------------|--------------|-----------|--------------|-----------------|------------------------|-------------------|---------------------------|--------------------------------|
|                          |              |           |              |                 |                        |                   |                           |                                |
| New Sources              |              | 0,000,000 |              |                 |                        |                   |                           |                                |
| Loading                  | ***          | **        | 10,808       | **              | **                     | **                | 0.24                      | **                             |
| Fugitives                | **           | **        | 0.22         | , e-e-          | **                     | **                | ***                       | **                             |
| Total Project Increases: | N-N-         |           | 10,808       | ***             |                        |                   | 0.24                      | **                             |
| PSD Threshold            | 250          | 250       | 250          | 250             | 250                    | 250               | 10                        | 7                              |
| PSD Review Required      | N/A          | N/A       | Yes          | N/A             | N/A                    | N/A               | N/A                       | N/A                            |

Table 7-1. FNSR PSD Analysis Summary

#### 7.2. FEDERAL BACT

Based on the BACR analysis, TGTI has determined that submerged loading is BACT for the proposed SPM buoy system. Given that VRU and VCU are both technologically infeasible and there are no comparable sources in RBLC that show otherwise, TGTI proposes submerged loading as BACT. A detailed BACT analysis was provided under separate cover in the NSR application.

Table 7-2. - Summary of Proposed BACT (VOC)

| Emission<br>Unit   | Pollutant | BACT Determination  | Proposed BACT<br>Emission Limit | Averaging<br>Period |  |
|--------------------|-----------|---|---------------------------------|---------------------|--|
| SPM Buoy<br>System | voc       | Submerged Loading and loading<br>ships which comply with VOC<br>management plan requirements in<br>MEPC.185(59) | N/A                             | N/A                 |  |

#### 7.3. AIR QUALITY MODELING AND OTHER IMPACT ANALYSES

While the NAAQS compliance demonstration and State Health Effects Review are being submitted under separate cover, the Additional Impacts Analysis is addressed below.

#### 7.4. ADDITIONAL IMPACTS ANALYSIS

Due to the large distance of the Project's location from land areas, TGTI believes that the following impact analyses would not be applicable to the proposed project:

- Growth analysis
- Soils and vegetation analysis
- Visibility impairment analysis

Federal and TCEQ guidelines require that an air quality dispersion modeling analysis (including visibility analysis) be performed for each Class I area located within 100 km of a facility undergoing an installation/modification that exceeds PSD significant emission rates. Since the nearest Class I area is more than 500 km from the proposed SPM buoy system, a Class I area analysis is not required.

#### 7.5. CASE-BY-CASE MACT ANALYSIS

TGTI developed a case-by-case MACT under section 112(g) of the CAA and 40 CFR 63, as referenced in 30 TAC Chapter 116, Subchapter E. The case-by-case application was developed because the SPM buoy system will be a major source of HAP emissions that is not regulated by an existing MACT standard. TGTI has concluded that submerged fill and loading of only ships which comply with VOC management plan requirements in MEPC.185(59) represents MACT for the proposed SPM buoy system since this is the control that is met by the best similar source and additional control beyond this is not feasible due to technical and safety constraints. Therefore, submerged fill and loading only ships which meet the VOC management plan requirements of MEPC.185(59) meets MACT under 112(g) for HAP emissions from the proposed SPM buoy system.

#### 7.6. STATE REGULATORY REQUIREMENTS

#### 7.6.1. General Application Requirements (30 TAC §116.111)

(1) a completed Form PI-1 General Application signed by an authorized representative of the applicant. All additional support information specified on the form must be provided before the application is complete;

A completed TCEQ Form PI-1 signed by an authorized representative and all additional supporting information as specified on the form are provided in this application.

- (2) information which demonstrates that emissions from the facility, including any associated dockside vessel emissions, meet all of the following.
- (2)(A) Protection of public health and welfare.
- (2)(A)(i) The emissions from the proposed facility will comply with all rules and regulations of the commission and with the intent of the Texas Clean Air Act (TCAA), including protection of the health and property of the public.

TGTI will comply with all rule and regulations of the commission and with the intent of the Texas Clean Air Act (TCAA), including protection of the health and property of the public. A review of potentially applicable rules is provided below.

Chapter 101 – General Rules: The proposed SPM buoy system will be operated in accordance with all applicable requirements in Chapter 101. Specifically, the proposed SPM buoy system will be operated in accordance with the Chapter 101 General Rules relating to circumvention, nuisance, traffic hazard, notification and recordkeeping requirements for emission events and for startup/shutdown/maintenance, sampling and sampling port procedures, emissions inventory requirements, compliance with Environmental Protection Agency Standards, the National Primary and Secondary Ambient Air Quality Standards, inspection fees, emissions fees, and all other applicable General Rules.

Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter: The proposed SPM buoy system will comply with all applicable requirements in Chapter 111.

Chapter 112 – Control of Air Pollution from Sulfur Compounds: The proposed SPM buoy system will comply with all applicable emission limitations, allowable emission rates, monitoring, reporting, and recordkeeping requirements of 30 TAC Chapter 112.

Chapter 113 – Control of Air Pollution from Toxic Materials: Chapter 113 regulates the emission of radionuclides (40 CFR Part 61, Subpart R), municipal solid waste landfills, hospital/medical/infectious waste incinerators, and hazardous air pollutants for source categories (40 CFR Part 63). There will be no emissions of radionuclides from the proposed SPM buoy system. The proposed SPM buoy system is not a municipal solid waste landfill and does not have a hospital/medical/ infectious waste incinerator. Therefore, these sections of the regulation do not apply. Emissions from hazardous air pollutants are regulated under the MACT program, addressed in the discussion of compliance with Chapter 122 in item (2)(F) below.

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Chapter 114 – Control of Air Pollution from Motor Vehicles: No motor vehicles will operate at the proposed SPM buoy system. Therefore, the provisions of Chapter 114 do not apply.

Chapter 115 – Control of Air Pollution from Volatile Organic Compounds (VOC): The proposed SPM buoy system will comply with all applicable requirements in Chapter 115 for loading operations.

Chapter 117 – Control of Air Pollution from Nitrogen Compounds: The proposed SPM buoy system will not be located in a county that is subject to the requirements of Chapter 117.

Chapter 118 – Control of Air Pollution Episodes: The proposed SPM buoy system will not be located in a county that is subject to the requirements of Chapter 118.

Chapter 122 – Federal Operating Permits: The proposed SPM buoy system will be a major source of regulated pollutants as defined in 30 TAC Chapter 122. TGTI will submit a Title V Permit application per the requirements of 40 CFR Part 71 per EPA Region 6 request.

(2)(B) Measurement of emissions. The proposed facility will have provisions for measuring the emission of significant air contaminants as determined by the executive director. This may include the installation of sampling ports on exhaust stacks and construction of sampling platforms in accordance with guidelines in the "Texas Commission on Environmental Quality Sampling Procedures Manual."

Emissions from any source addressed in the application will be sampled upon request of the Executive Director of the TCEQ, and sampling ports and sampling platforms will be installed as needed.

(2)(C) Best available control technology (BACT) must be evaluated for and applied to all facilities subject to the TCAA. Prior to evaluation of BACT under the TCAA, all facilities with pollutants subject to regulation under Title I Part C of the Federal Clean Air Act (FCAA) shall evaluate and apply BACT as defined in §116.160(c)(1)(A) of this title (relating to Prevention of Significant Deterioration Requirements).

This permit application demonstrates that the proposed SPM buoy system will utilize BACT for all emissions sources being proposed as part of this permit application.

(2)(D) New Source Performance Standards (NSPS). The emissions from the proposed facility will meet the requirements of any applicable NSPS as listed under 40 Code of Federal Regulations (CFR) Part 60, promulgated by the United States Environmental Protection Agency (EPA) under FCAA, §111, as amended.

The proposed SPM buoy system will not be subject to any NSPS under 40 CFR Part 60.

(2)(E) National Emission Standards for Hazardous Air Pollutants (NESHAP). The emissions from the proposed facility will meet the requirements of any applicable NESHAP, as listed under 40 CFR Part 61, promulgated by EPA under FCAA, §112, as amended.

The proposed SPM buoy system will not be subject to NESHAPs under 40 CFR Parts 61.

(2)(F) NESHAP for source categories. The emissions from the proposed facility will meet the requirements of any applicable maximum achievable control technology standard as listed under 40 CFR Part 63, promulgated by the EPA under FCAA, §112 or as listed under Chapter 113, Subchapter C of this title (relating to National Emissions Standards for Hazardous Air Pollutants for Source Categories (FCAA §112, 40 CFR Part 63)).

TGTI has submitted a case-by-case MACT applicability assessment to demonstrate that the maximum achievable control technology is being applied to the proposed SPM buoy system.

(2)(G) Performance demonstration. The proposed facility will achieve the performance specified in the permit application. The applicant may be required to submit additional engineering data after a permit has been issued in order to demonstrate further that the proposed facility will achieve the performance specified in the permit application. In addition, dispersion modeling, monitoring, or stack testing may be required.

The proposed SPM buoy system will achieve the performance represented in this permit application.

(2)(H) Nonattainment review. If the proposed facility is located in a nonattainment area, it shall comply with all applicable requirements in this chapter concerning nonattainment review.

As discussed earlier in this section, the proposed SPM buoy system is not located in a nonattainment county, NNSR is not applicable.

(2)(1) Prevention of Significant Deterioration (PSD) review.

(2)(1)(i) If the proposed facility is located in an attainment area, it shall comply with all applicable requirements in this chapter concerning PSD review.

(2)(I)(ii) If the proposed facility or modification meets or exceeds the applicable greenhouse gases thresholds defined in §116.164 of this title (relating to Prevention of Significant Deterioration Applicability for Greenhouse Gases Sources) then it shall comply with all applicable requirements in this chapter concerning PSD review for sources of greenhouse gases.

The proposed SPM buoy system is a new major source with respect to the PSD permitting program due to potential emissions of VOCs; therefore, TGTI has submitted and NSR air permit application under separate cover in order to comply with the PSD new source review requirements.

(2)(J) Air dispersion modeling. Computerized air dispersion modeling may be required by the executive director to determine air quality impacts from a proposed new facility or source modification. In determining whether to issue, or in conducting a review of, a permit application for a shipbuilding or ship repair operation, the commission will not require and may not consider air dispersion modeling results predicting ambient concentrations of non-criteria air contaminants over coastal waters of the state. The commission shall determine compliance with non-criteria ambient air contaminant standards and guidelines at land-based off-property locations.

TGTI has conducted air dispersion modeling to demonstrate the ambient air impacts of the proposed SPM buoy system. They have been submitted under separate cover.

(2)(K) Hazardous air pollutants. Affected sources (as defined in §116.15(1) of this title (relating to Section 112(g) Definitions)) for hazardous air pollutants shall comply with all applicable requirements under Subchapter E of this chapter (relating to Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources (FCAA, §112(g), 40 CFR Part 63)).

TGTI will comply will comply with all applicable requirements under Subchapter E of this chapter as related to Section 112(g).

(2)(L) Mass cap and trade allowances. If subject to Chapter 101, Subchapter H, Division 3, of this title (relating to Mass Emissions Cap and Trade Program), the proposed facility, group of facilities, or account must obtain allowances to operate.

This regulation refers to Chapter 101, Subchapter H, Division 3, which applies to facilities in the Houston-Galveston-Brazoria (HGB) ozone nonattainment area. The proposed SPM buoy system will not located in the HGB ozone nonattainment area. Therefore, the provisions of this regulation do not apply.

- (b) In order to be granted a permit, amendment, or special permit amendment, the owner or operator must comply with the following notice requirements.
- (1) Applications declared administratively complete before September 1, 1999, are subject to the requirements of Division 3 of this subchapter (relating to Public Notification and Comment Procedures).

Not applicable. The permit application will be sent to the TCEQ in 2018.

(2) Applications declared administratively complete on or after September 1, 1999, are subject to the requirements of Chapter 39 of this title (relating to Public Notice) and Chapter 55 of this title (relating to Request for Reconsideration and Contested Case Hearings; Public Comment). Upon request by the owner or operator of a facility which previously has received a permit or special permit from the commission, the executive director or designated representative may exempt the relocation of such facility from the provisions in Chapter 39 of this title if there is no indication that the operation of the facility at the proposed new location will significantly affect ambient air quality and no indication that operation of the facility at the proposed new location will cause a condition of air pollution.

TGTI will comply with all applicable notice requirements under Chapter 39 and Chapter 55 associated with this permit application.

#### 8.1. PERMIT FEE

Based on the requirements 40 CFR 71.9 Each permit application requires an application fee that is based upon the actual emissions from the project. The total fee is estimated in 40 CFR Part 71 form provided in Section 4 of this Title V application. Since this application is being submitted before the proposed project has begun operation, the required permit application fee is \$0.

| - |          |       | Table |       |       |
|---|----------|-------|-------|-------|-------|
| Q | CERTIFIC | ATION | 05    | COMPI | IANCE |

The certification of compliance is included in the 40 CFR Part 71 form provided in Section 4 of this application

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